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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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*In re:*

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**TWENTY-SECOND MONTHLY FEE STATEMENT OF GILBERT LLP,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC  
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION  
CLAIMANTS FOR THE PERIOD JULY 1, 2021 THROUGH JULY 31, 2021**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>July 1, 2021 through July 31, 2021</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$526,433.60 (80% of \$658,042.00)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$3,482.37 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this twenty-second monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing July 1, 2021 through July 31, 2021 (the “**Application Period**”).

**Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$658,042.00 in fees during

the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$526,433.60.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$835.40. The blended hourly rate of paraprofessionals during the Application Period is \$264.11.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$3,482.37 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$3,482.37.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

#### **FILING AND SERVICE**

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$526,433.60 (80% of \$658,042.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$3,482.37 (100%), for a total amount of \$529,915.97, for the Application Period.

Dated: September 9, 2021  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

/s/ Kami E. Quinn

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*Counsel for the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants.*

**Exhibit A**

**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORY**

<b>Project Code</b>	<b>Project Category</b>	<b>Hours Billed in Period</b>	<b>Fees for Period</b>
A001	Asset Analysis & Recovery	82.4	\$40,259.00
A004	Case Administration	1.6	\$408.00
A006	Employment / Fee Applications	8.5	\$3,476.00
A009	Meetings / Communications with AHC & Creditors	36.4	\$45,765.00
A019	Plan of Reorganization / Disclosure Statement	507.0	\$392,554.00
A020	Insurance Adversary Proceeding	230.3	\$175,580.00
		<b>866.2</b>	<b>\$658,042.00</b>

**Exhibit B**

**Summary of Compensation by Professional**

**SUMMARY OF COMPENSATION BY PROFESSIONAL**

<b>Name of Professional</b>	<b>Position / Year Admitted Practice</b>	<b>Hourly Billing Rate</b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Scott D. Gilbert	Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,700.00	41.5	\$70,550.00
Kami E. Quinn	Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009	\$1,100.00	25.0	\$27,500.00
Richard Leveridge	Partner / District of Columbia – 1981 State of New York – 1997	\$1,400.00	51.9	\$72,660.00
Craig J. Litherland	Partner / State of Texas – 1983 Supreme Court of Texas – 1983 U.S. Court of Appeals Fifth Circuit – 1984 U.S. District Court for the Southern District of Texas – 1985 U.S. Federal Court for the Eastern District of Michigan – 1995 District of Columbia - 2001 U.S. District Court for the Western District of Texas – 2008 Cherokee Nation – 2017	\$1,400.00	10.2	\$14,280.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,350.00	33.5	\$45,225.00
Hunter Winstead	Partner / Commonwealth of Virginia – 2004 District of Columbia – 2006	\$950.00	11.2	\$10,640.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$800.00	111.4	\$89,120.00
Jenna Hudson	Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia – 2019	\$725.00	97.9	\$70,977.50



<b>Name of Professional</b>	<b>Position / Year Admitted Practice</b>	<b>Hourly Billing Rate</b>	<b>Hours Billed for Period</b>	<b>Total Fees for Period</b>
Emily Grim	Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020	\$700.00	130.1	\$91,070.00
Dan Wolf	Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012	\$700.00	16.9	\$11,830.00
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia - 2017	\$675.00	21.9	\$14,782.50
Heather Frazier	Associate / State of Florida – 2009 District of Columbia - 2017	\$675.00	22.8	\$15,390.00
Sarah Sradars	Associate / State of New York – 2016 District of Columbia – 2017	\$575.00	46.3	\$26,622.50
Alison Gaske	Associate / District of Columbia – 2016	\$575.00	51.0	\$29,325.00
Ethan Kaminsky	Associate / State of New York – 2018	\$500.00	62.6	\$31,300.00
Janet Sanchez	Associate / Commonwealth of Virginia – 2020	\$375.00	17.2	\$6,450.00
Stephanie Colcock	Paralegal – Joined firm in 2020	\$330.00	17.3	\$5,709.00
Alyssa Bonesteel	eDiscovery Specialist – Joined firm in 2017	\$315.00	21.9	\$6,898.50
Katherine Johnson	Paralegal – Joined firm in 2018	\$230.00	23.9	\$5,497.00
Sara Ogrey	Paralegal – Joined firm in 2019	\$230.00	46.3	\$10,649.00
Peggy Holland	Litigation Specialist – Joined firm in 2002	\$290.00	5.4	\$1,566.00
	<b>Totals</b>		<b>866.2</b>	<b>\$658,042.00</b>
	<b>Attorney Blended Rate</b>	<b>\$835.40</b>		
	<b>Paraprofessional Blended Rate</b>	<b>\$264.11</b>		

**Exhibit C**

**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Lexis	\$1,435.45
Pacer	\$94.40
Westlaw	\$1,277.61
Messenger & Delivery	\$104.11
Travel – Airfare (Coach)	\$570.80
<b>Total</b>	<b>\$3,482.37</b>

**Exhibit D**

**Time and Expense Detail**



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Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

September 9, 2021  
Invoice Number: 11324202  
Client Number: 1599  
Tax ID: 52-2283869

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**FOR PROFESSIONAL SERVICES RENDERED through July 31, 2021**

**Re: Ad Hoc Committee (Purdue)**

<b>Matter Description</b>	<b>Fees</b>	<b>Costs</b>	<b>Total</b>
Purdue Bankruptcy	658,042.00	3,482.37	661,524.37
<b>Total</b>	<b>658,042.00</b>	<b>3,482.37</b>	<b>661,524.37</b>

TOTAL FEES \$ 658,042.00

TOTAL EXPENSES \$ 3,482.37

**TOTAL FEES AND EXPENSES \$ 661,524.37**

**FOR PROFESSIONAL SERVICES RENDERED through July 31, 2021**

**Purdue Bankruptcy**

**A001: Asset Analysis & Recovery**

<b>Name</b>	<b>Date</b>	<b>Services</b>	<b>Hours</b>	<b>Amount</b>
Hudson, J.	7/02/21	Confer with co-counsel and Debtors re coordinating on insurance matters.	.30	217.50
Hudson, J.	7/02/21	Confer with team re insurance recovery strategy.	.80	580.00
Wolf, D.	7/02/21	Confer with J. Hudson, J. Rubinstein, M. Rush, S. Sraders, S. Colcock, and S. Martinez re insurance recovery strategy.	.80	560.00
Rush, M.	7/02/21	Confer with team re case status and strategy.	.80	540.00
Sraders, S.	7/02/21	Confer with team re status of current matters and next steps.	.80	460.00
Colcock, S.	7/02/21	Confer with litigation team (M. Rush, J. Rubinstein, S. Martinez) and insurance team (J. Hudson) re status and strategy and strategy.	.80	264.00
Colcock, S.	7/06/21	Review status of Marsh production.	.30	99.00
Ogrey, S.	7/07/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	1.00	230.00
Bonesteel, A.	7/08/21	Review supplemental production of Marsh policies.	.80	252.00
Bonesteel, A.	7/08/21	Review Debtors' policies and compare to KCIC version.	1.00	315.00
Gaske, A.	7/08/21	Review status of settlement engagement for each insurer (3.5); draft document categorizing insurers by status (2.4).	5.90	3,392.50
Gaske, A.	7/08/21	Review access to Marsh production re policy analysis.	.30	172.50
Ogrey, S.	7/08/21	Revise master tracking sheet of cases against Debtors.	.20	46.00
Sraders, S.	7/08/21	Review bankruptcy docket re insurance counsel.	.10	57.50
Hudson, J.	7/09/21	Review prior correspondence in preparation for settlement discussions with insurers.	.40	290.00
Wolf, D.	7/09/21	Correspond with D&O insurers re coverage positions.	.40	280.00
Bonesteel, A.	7/09/21	Review supplemental production of Marsh policies.	1.00	315.00
Gaske, A.	7/09/21	Draft correspondence to each insurer re confidentiality.	1.80	1,035.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Gaske, A.	7/09/21	Communicate with S. Ogrey re drafting insurer specific confidentiality agreements (1.1); review draft confidentiality agreements (1.0).	2.10	1,207.50
Ogrey, S.	7/09/21	Draft insurer confidentiality agreements for insurers who responded to July 1 letter.	5.00	1,150.00
Hudson, J.	7/10/21	Confer with insurer counsel re potential for settlement prior to confirmation.	1.20	870.00
Hudson, J.	7/11/21	Confer with insurer counsel re potential for settlement prior to confirmation.	.40	290.00
Hudson, J.	7/12/21	Outline next steps for settlement with insurers.	.40	290.00
Hudson, J.	7/12/21	Revise response to Kemper (liquidation).	.10	72.50
Hudson, J.	7/12/21	Confer with UCC and Debtors' counsel re settlement discussions with insurers.	.10	72.50
Hudson, J.	7/12/21	Confer with co-plaintiffs' counsel re Insurer #26 response to settlement overture.	.10	72.50
Hudson, J.	7/12/21	Review next steps for settlement with Insurer #9.	.10	72.50
Wolf, D.	7/12/21	Confer with A. Kramer re correspondence with D&O insurers.	.50	350.00
Johnson, K.	7/12/21	Review insurer-related settlement communication.	.20	46.00
Gaske, A.	7/12/21	Revise insurer tracking spreadsheet re additional correspondence (0.3); draft correspondence to certain insurers re confidentiality agreements (0.8).	1.10	632.50
Ogrey, S.	7/12/21	Review confidentiality agreements sent to insurers and identify which insurers didn't receive an agreement.	.80	184.00
Ogrey, S.	7/12/21	Draft settlement reference sheet for Insurer #13.	.40	92.00
Ogrey, S.	7/12/21	Review and organize confidentiality correspondence (2.7); distribute correspondence to co-counsel (0.4).	3.10	713.00
Hudson, J.	7/13/21	Confer with Debtors (A. Kramer) re responding to Kemper information requests.	.10	72.50
Gaske, A.	7/13/21	Review treatment of defense costs in certain policies.	.60	345.00
Ogrey, S.	7/13/21	Review and organize insurer correspondence re Insurer #9 response to 7/10/2021 email re confidentiality agreement.	.10	23.00
Kaminsky, E.	7/13/21	Research policies (2.4); draft memorandum re coverage (1.0).	3.40	1,700.00
Ogrey, S.	7/14/21	Review bankruptcy, adversary, and SDNY dockets re insurance-related pleadings.	1.50	345.00
Ogrey, S.	7/15/21	Review and organize correspondence sent by Insurer #5 re confidentiality agreement email sent 7/10/2021.	.20	46.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/16/21	Review next steps for settlement.	.20	145.00
Gaske, A.	7/16/21	Revise correspondence tracking spreadsheet.	.20	115.00
Hudson, J.	7/19/21	Review settlement-related correspondence from insurers.	.10	72.50
Gaske, A.	7/20/21	Analyze edits to confidentiality agreement from Insurers #18, #19, and #20.	1.10	632.50
Gaske, A.	7/20/21	Confer with S. Ogrey re attachment to confidentiality agreement for Insurers #18, #19, and #20 (0.1); review attachment (0.3).	.40	230.00
Ogrey, S.	7/20/21	Review comparison of Insurers #18, #19 and #20 original confidentiality agreement to what insurers have sent back to us.	.20	46.00
Ogrey, S.	7/20/21	Review Insurers #18, #19 and #20 schedule of policies for confidentiality agreement.	.40	92.00
Ogrey, S.	7/20/21	Review and organize response correspondence re confidentiality agreement re Insurers #4 and #7.	.10	23.00
Hudson, J.	7/21/21	Outline next steps for settlement in light of most recent correspondence from multiple insurers.	1.90	1,377.50
Hudson, J.	7/21/21	Analyze next steps for insurance recovery strategy.	.10	72.50
Johnson, K.	7/21/21	Review past insurer correspondence specific to Insurers #18, #19, and #20.	.70	161.00
Gaske, A.	7/21/21	Review and revise draft exhibits to confidentiality agreements.	1.90	1,092.50
Ogrey, S.	7/21/21	Update contact information re Insurers #18, #19, and #20.	.20	46.00
Ogrey, S.	7/21/21	Review correspondence sent from Insurers #3 and #7 re confidentiality agreement.	.30	69.00
Ogrey, S.	7/21/21	Draft attachments to confidentiality agreements re various insurers' policies that were mentioned in the agreements.	3.00	690.00
Ogrey, S.	7/21/21	Review and organize correspondence sent re confidentiality agreement from Insurer #34.	.10	23.00
Shore, R.	7/22/21	Prepare for Insurers #18, #19, and #20 settlement meeting.	.50	675.00
Hudson, J.	7/22/21	Confer with counsel for Insurers #18, #19 and #20 re materials in advance of settlement call.	.10	72.50
Hudson, J.	7/22/21	Confer with counsel for Insurers #18, #19 and #20 re potential settlement.	.30	217.50
Hudson, J.	7/22/21	Summarize next steps following call with counsel for Insurers #18, #19, and #20 re potential settlement.	.20	145.00
Hudson, J.	7/22/21	Revise materials requested by Insurers #18, #19 and #20 in advance of settlement call.	.30	217.50



Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/22/21	Update settlement talking points and issue summary for discussion with Insurers #18, #19, and #20.	.60	435.00
Hudson, J.	7/22/21	Review potential discounting applicable to Insurers #18, #19 and #20 in advance of settlement call.	.20	145.00
Hudson, J.	7/22/21	Revise insurance settlement strategy.	.30	217.50
Wolf, D.	7/22/21	Review recent correspondence from D&O insurers re coverage matters.	.20	140.00
Johnson, K.	7/22/21	Revise correspondence tracking spreadsheet re settlement communication.	.70	161.00
Johnson, K.	7/22/21	Confer with S. Colcock re revision of settlement reference sheets.	.40	92.00
Gaske, A.	7/22/21	Review draft of agreement with Insurer #12 and prior similar agreements.	1.50	862.50
Gaske, A.	7/22/21	Revise tracking spreadsheet re summary of certain insurer correspondence.	.40	230.00
Colcock, S.	7/22/21	Confer with K. Johnson re settlement reference sheets.	.40	132.00
Kaminsky, E.	7/22/21	Revise confidentiality agreements.	2.20	1,100.00
Kaminsky, E.	7/22/21	Revise Document O.	3.80	1,900.00
Kaminsky, E.	7/22/21	Confer with insurers re insurance recovery.	.50	250.00
Kaminsky, E.	7/22/21	Draft summary of discussions re insurance recovery.	1.30	650.00
Johnson, K.	7/23/21	Revise insurer settlement reference sheets.	2.80	644.00
Hudson, J.	7/27/21	Revise response to questions raised by Insurer #22.	1.20	870.00
Ogrey, S.	7/27/21	Draft the remaining attachments to confidentiality agreements.	1.90	437.00
Hudson, J.	7/28/21	Revise letter to Insurer #22.	.30	217.50
Hudson, J.	7/28/21	Revise potential discounting applicable to insurers in advance of settlement discussions.	1.10	797.50
Hudson, J.	7/28/21	Draft demand letter to Insurers #18, #19, and #20.	1.10	797.50
Hudson, J.	7/28/21	Review settlement communications from various insurers.	.30	217.50
Hudson, J.	7/28/21	Analyze edits proposed by various insurers to confidentiality agreements for settlement discussions.	.10	72.50
Hudson, J.	7/28/21	Review draft settlement agreement provided by Insurer #12.	.10	72.50
Gaske, A.	7/28/21	Revise exhibits to confidentiality agreements.	.30	172.50
Kaminsky, E.	7/28/21	Revise letter to Kemper Liquidator re recovery.	2.30	1,150.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/29/21	Analyze impact of potential discounting applicable to insurers in advance of settlement discussions.	.60	435.00
Gaske, A.	7/29/21	Analyze draft settlement agreement with Insurer #12 re compare to prior agreement in time.	2.00	1,150.00
Hudson, J.	7/30/21	Review status of settlement discussions with various insurers.	.80	580.00
Hudson, J.	7/30/21	Revise demand letter to Insurers #18, #19 and #20.	.10	72.50
Hudson, J.	7/30/21	Finalize confidentiality agreement with Insurers #18, #19, and #20.	.20	145.00
Hudson, J.	7/30/21	Analyze next steps for insurance recovery.	.40	290.00
Hudson, J.	7/30/21	Communicate with S. Gilbert re settlement negotiations with insurers.	.10	72.50
Ogrey, S.	7/30/21	Review and organize insurer correspondence sent from Insurer #13.	.10	23.00
Kaminsky, E.	7/30/21	Revise letter to Kemper Liquidator re recovery.	1.20	600.00
Hudson, J.	7/31/21	Revise demand letter to Insurers #18, #19, and #20.	1.60	1,160.00
<b>Project Total:</b>			<b>82.40</b>	<b>\$ 40,259.00</b>

#### A004: Case Administration

Name	Date	Services	Hours	Amount
Colcock, S.	7/01/21	Revise bankruptcy calendar to reflect deposition deadlines.	.20	66.00
Colcock, S.	7/06/21	Revise litigation calendar for discovery response deadline for the non-arbitrator insurers.	.20	66.00
Johnson, K.	7/21/21	Review and organize discovery pleadings and calendar related dates.	.80	184.00
Johnson, K.	7/27/21	Review and organize discovery pleadings; calendar relevant dates.	.40	92.00
<b>Project Total:</b>			<b>1.60</b>	<b>\$ 408.00</b>

#### A006: Employment / Fee Applications

Name	Date	Services	Hours	Amount
Sraders, S.	7/01/21	Draft supplemental order to reimburse fees for Nathan Associates.	.60	345.00
Sraders, S.	7/02/21	Revise draft supplemental order re Nathan fees.	.30	172.50
Sraders, S.	7/06/21	Draft supplemental order for reimbursement of Nathan Associates fees.	.40	230.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Grim, E.	7/08/21	Revise proposed fee order for expert reimbursement.	.60	420.00
Sraders, S.	7/08/21	Revise draft supplemental order for reimbursement of Nathan fees.	.80	460.00
Holland, P.	7/09/21	Review and provide comments to proposed supplemental order authorizing payment of expert Nathan Associates (0.7); communicate with E. Grim and J. Hudson re same (0.1).	.80	232.00
Grim, E.	7/09/21	Revise proposed fee order for experts.	.20	140.00
Holland, P.	7/14/21	Draft May fee statement.	1.40	406.00
Holland, P.	7/14/21	Draft 5th interim fee application.	1.90	551.00
Holland, P.	7/21/21	Draft June fee statement.	1.30	377.00
Hudson, J.	7/26/21	Revise supplemental order for engagement of confirmation expert.	.10	72.50
Grim, E.	7/28/21	Revise retention motion for Nathan Associates.	.10	70.00
<b>Project Total:</b>			<b>8.50</b>	<b>\$ 3,476.00</b>

**A009: Meetings / Communications with AHC & Creditors**

Name	Date	Services	Hours	Amount
Gilbert, S.	7/01/21	Confer with AHC re plan.	1.00	1,700.00
Gilbert, S.	7/01/21	Meet with AHC working group re plan.	1.00	1,700.00
Gilbert, S.	7/01/21	Correspond with AHC working group re plan issues.	.70	1,190.00
Gilbert, S.	7/06/21	Confer with AHC working group re plan.	.50	850.00
Quinn, K.	7/07/21	Participate in call with AHC re status and strategy.	.90	990.00
Hudson, J.	7/07/21	Confer with Ad Hoc Committee re status.	.90	652.50
Grim, E.	7/07/21	Confer with AHC re plan supplement negotiations and insurance litigation.	.90	630.00
Leveridge, R.	7/07/21	Revise client strategy presentation (1.9); attend meeting with client re same (1.0).	2.90	4,060.00
Gilbert, S.	7/08/21	Confer with AHC working group re plan release negotiations.	1.00	1,700.00
Gilbert, S.	7/13/21	Meet with AHC working group re plan revisions.	1.00	1,700.00
Gilbert, S.	7/14/21	Telephone calls with AHC working group re plan.	1.60	2,720.00
Gilbert, S.	7/14/21	Correspond with full AHC re plan revisions.	1.50	2,550.00
Quinn, K.	7/14/21	Confer with AHC re status and strategy.	1.60	1,760.00
Winstead, H.	7/14/21	Confer with Committee re potential mediator submission and coordination of same with fee declaration draft (partial).	.60	570.00
Hudson, J.	7/14/21	Confer with AHC re status and strategy.	1.60	1,160.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Grim, E.	7/14/21	Confer with AHC re plan negotiations and insurance update.	1.60	1,120.00
Wolf, D.	7/14/21	Confer with clients re plan documents and insurance coverage matters.	1.60	1,120.00
Gilbert, S.	7/15/21	Confer with AHC working group re co-defendant neogiations.	1.00	1,700.00
Gilbert, S.	7/15/21	Confer with tribes re plan.	.50	850.00
Gilbert, S.	7/19/21	Confer with AHC working group re plan issues.	1.00	1,700.00
Gilbert, S.	7/20/21	Confer with AHC working group re plan.	1.00	1,700.00
Gilbert, S.	7/20/21	Correspond with AH working group re plan.	.50	850.00
Gilbert, S.	7/21/21	Meet with AHC re plan.	1.30	2,210.00
Quinn, K.	7/21/21	Participate in call with Committee re plan objections.	1.30	1,430.00
Hudson, J.	7/21/21	Confer with Ad Hoc Committee re status.	1.30	942.50
Grim, E.	7/21/21	Confer with AHC re response to plan objections and other updates.	1.30	910.00
Gilbert, S.	7/27/21	Confer with AHC working group re plan.	1.00	1,700.00
Gilbert, S.	7/28/21	Confer with J. Guard re plan and declaration in support of plan.	.50	850.00
Gilbert, S.	7/28/21	Meet with AHC re plan negotiations and litigation.	1.40	2,380.00
Quinn, K.	7/28/21	Confer with clients re status and strategy.	1.40	1,540.00
Hudson, J.	7/28/21	Confer with AHC re response to plan negotiations.	1.40	1,015.00
Grim, E.	7/28/21	Confer with AHC re plan negotiations, KEIP motion, and confirmation briefing.	1.40	980.00
Sraders, S.	7/28/21	Confer with Ad Hoc Committee re status of proceedings and strategy for next steps (partial).	.60	345.00
Gilbert, S.	7/29/21	Confer with AHC working group re strategy for plan litigation.	1.00	1,700.00
Gilbert, S.	7/30/21	Confer with J. Rice re plan negotiations.	.50	850.00
<b>Project Total:</b>			<b>39.30</b>	<b>\$ 49,825.00</b>

**A019: Plan of Reorganization / Disclosure Statement**

Name	Date	Services	Hours	Amount
Gilbert, S.	7/01/21	Confer with Davis Polk re open plan issues related to public schools.	.50	850.00
Quinn, K.	7/01/21	Analyze confirmation strategy.	.80	880.00
Quinn, K.	7/01/21	Review Chubb comments to plan.	.30	330.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Litherland, C.	7/01/21	Analyze confirmation strategy and preparation, structure of valuation options, and next steps re adversary.	2.00	2,800.00
Hudson, J.	7/01/21	Confer with UCC (D. Windscheffel and S. Hanson) re shareholder insurance assignment.	.40	290.00
Hudson, J.	7/01/21	Review schedule applicable to insurance-related confirmation experts.	.10	72.50
Hudson, J.	7/01/21	Revise list of insurance-related tasks leading up to confirmation.	.60	435.00
Hudson, J.	7/01/21	Analyze insurance-related tasks to be completed leading up to confirmation.	.80	580.00
Hudson, J.	7/01/21	Confer with Debtors (S. Birnbaum and Davis Polk) re preparing for presentation at confirmation.	.10	72.50
Hudson, J.	7/01/21	Analyze approaches to so-called "neutrality" in plan.	.10	72.50
Hudson, J.	7/01/21	Confer with Committee co-counsel re coordinating plan-related tasks.	.20	145.00
Hudson, J.	7/01/21	Analyze potential for insurance-related confirmation findings.	.20	145.00
Hudson, J.	7/01/21	Revise list of MDT insurance policies.	.30	217.50
Grim, E.	7/01/21	Analyze strategy re confirmation hearing.	1.70	1,190.00
Grim, E.	7/01/21	Revise TDP and MDT agreements.	.50	350.00
Wolf, D.	7/01/21	Revise Sackler settlement agreement re insurance matters.	1.00	700.00
Wolf, D.	7/01/21	Revise plan documents re comments from Chubb re insurance provisions.	.60	420.00
Rush, M.	7/01/21	Research case law re confirmation issues.	1.80	1,215.00
Sraders, S.	7/01/21	Analyze plan provisions to determine structure of reorganized Debtors.	3.30	1,897.50
Colcock, S.	7/01/21	Review seventh plan supplement pursuant to fifth amended plan (0.5); revise pleading tracking spreadsheet re supplement (0.1).	.60	198.00
Quinn, K.	7/02/21	Revise draft plan-related findings.	.30	330.00
Shore, R.	7/02/21	Confer with AHC co-counsel and Debtors' counsel re confirmation findings and "reasonableness" issues (1.2); confer with co-counsel re motion to withdraw reference (0.8); analyze shareholders insurance rights (1.6); draft proposed findings for confirmation order (2.4).	6.00	8,100.00
Litherland, C.	7/02/21	Communications with J. Hudson and others re discussions of confirmation proof.	.40	560.00
Litherland, C.	7/02/21	Analysis of best entities against whom claims could be asserted in insurance back-up option.	.80	1,120.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/02/21	Confer with co-counsel for AHC (R. Ringer and D. Blabey) re evidence to support sections 1129 and 9019 requirements at confirmation.	.70	507.50
Hudson, J.	7/02/21	Confer with Debtors' counsel (Davis Polk) and co-counsel for AHC (R. Ringer and D. Blabey) re evidence to support sections 1129 and 9019 requirements at confirmation.	.60	435.00
Hudson, J.	7/02/21	Revise insurance-related findings for plan.	.20	145.00
Hudson, J.	7/02/21	Revise Sackler insurance assignment documentation.	1.70	1,232.50
Hudson, J.	7/02/21	Analyze approaches to potential valuation rebuttal witness.	.20	145.00
Hudson, J.	7/02/21	Revise list of MDT insurance policies.	1.00	725.00
Grim, E.	7/02/21	Confer with co-counsel (R. Ringer, D. Blabey) re strategy for confirmation.	.60	420.00
Grim, E.	7/02/21	Confer with co-counsel (R. Ringer, D. Blabey) and Debtor counsel (E. Vonnegut) re confirmation brief.	.70	490.00
Grim, E.	7/02/21	Revise MDT agreement.	.30	210.00
Wolf, D.	7/02/21	Confer with E. Vonnegut, S. Massman, A. Kramer, and J. Hudson re Sackler settlement agreement re insurance matters.	.50	350.00
Wolf, D.	7/02/21	Revise Sackler settlement agreement re insurance matters.	1.00	700.00
Wolf, D.	7/02/21	Analyze Sackler settlement agreement re insurance matters.	.70	490.00
Wolf, D.	7/02/21	Revise list of excluded insurance policies.	.40	280.00
Wolf, D.	7/02/21	Revise draft confirmation order findings re insurance coverage matters.	.40	280.00
Sraders, S.	7/02/21	Review confirmation schedule / deadlines.	.50	287.50
Hudson, J.	7/03/21	Review MDT agreement issues with respect to insurance.	.40	290.00
Hudson, J.	7/03/21	Confer with Debtors, shareholder parties, MSGE, and UCC re MDT agreement with respect to insurance.	.60	435.00
Grim, E.	7/03/21	Review creditor trust TDPs and trust agreements (1.2); revise same (0.9).	2.10	1,470.00
Wolf, D.	7/03/21	Confer with E. Vonnegut, S. Massman, J. Dougherty, D. Porat, A. Kramer, and J. Hudson re Sackler settlement agreement.	.50	350.00
Quinn, K.	7/04/21	Correspond with C. Litherland, J. Hudson, and E. Grim re treatment of insurance.	.20	220.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Litherland, C.	7/04/21	Communications with K. Quinn, J. Hudson, and others re insurance back-up structure to establish claim values.	.70	980.00
Grim, E.	7/04/21	Revise MDT agreement and master TDP.	.80	560.00
Quinn, K.	7/05/21	Review comments to Trust agreement drafts.	.30	330.00
Quinn, K.	7/05/21	Review materials and provide comments re proposed expert reports.	.50	550.00
Shore, R.	7/05/21	Analyze TDP and trust agreements.	.50	675.00
Quinn, K.	7/06/21	Analyze TDP issues.	1.00	1,100.00
Shore, R.	7/06/21	Review TDP and trust agreements (0.8); revise PowerPoint re adversary decision and impact (1.0).	1.80	2,430.00
Litherland, C.	7/06/21	Review proposed confirmation findings.	.40	560.00
Hudson, J.	7/06/21	Communicate with Chubb re proposed edits to plan.	.50	362.50
Hudson, J.	7/06/21	Analyze insurance aspects of TDP and MDT agreements.	.70	507.50
Hudson, J.	7/06/21	Analyze approach to insurance-related findings to be sought in connection with confirmation.	.10	72.50
Hudson, J.	7/06/21	Revise MDT agreement and others portions of plan supplement to address insurance issues.	2.20	1,595.00
Hudson, J.	7/06/21	Confer with Debtors re so-called "neutrality" and other comments to plan from insurers.	.10	72.50
Grim, E.	7/06/21	Review documents in plan supplement.	1.30	910.00
Grim, E.	7/06/21	Review trust agreements and TDPs.	1.10	770.00
Grim, E.	7/06/21	Review plan for issues relating to TDP and trust agreement.	1.80	1,260.00
Grim, E.	7/06/21	Revise TDP and trust agreements.	.70	490.00
Grim, E.	7/06/21	Analyze TDP and trust agreements.	.80	560.00
Grim, E.	7/06/21	Revise confirmation order findings.	.30	210.00
Wolf, D.	7/06/21	Revise plan documents re Sacklers' proposed edits related to insurance coverage matters.	.80	560.00
Rush, M.	7/06/21	Continue researching issues re confirmation.	.90	607.50
Quinn, K.	7/07/21	Confer with team re direct action mechanism issues.	.70	770.00
Shore, R.	7/07/21	Confer with team re MDT agreement and direct action provisions (0.7); review slide deck for Committee meeting (1.0); revise confirmation findings (0.6); communicate with Debtors, Official Committee, and MSGE counsel re same (0.5); confer with A. Preis re same (0.5); attend Committee meeting re same (1.0).	4.30	5,805.00
Litherland, C.	7/07/21	Confer with R. Shore, E. Grim, J. Hudson, and K. Quinn re back-up valuation mechanisms.	.70	980.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Winstead, H.	7/07/21	Review and revise draft fee declaration.	1.30	1,235.00
Hudson, J.	7/07/21	Outline process for briefing on insurance issues at confirmation.	.60	435.00
Hudson, J.	7/07/21	Confer with counsel for Sacklers, IAPs, and Debtors re shareholder insurance assignment.	.50	362.50
Hudson, J.	7/07/21	Revise MDT agreement and other portions of plan supplement impacting insurance.	1.10	797.50
Hudson, J.	7/07/21	Analyze options for insurance-related findings.	.30	217.50
Hudson, J.	7/07/21	Confer with UCC (S. Hanson, D. Windscheffel) and Debtors (A. Kramer) re next steps for shareholder insurance assignment.	.80	580.00
Grim, E.	7/07/21	Review additional plan provisions relevant to MDT agreement and TDP.	1.20	840.00
Grim, E.	7/07/21	Communicate with Debtors' counsel (S. Massman) re follow-up issues from call re revisions to MDT agreement and TDP.	.70	490.00
Grim, E.	7/07/21	Confer with Debtors' counsel (S. Massman) re revisions to MDT agreement and TDP.	.80	560.00
Grim, E.	7/07/21	Communicate with team re follow-up issues from call with Debtors re revisions to MDT agreement and TDP.	.50	350.00
Grim, E.	7/07/21	Confer with team re revisions to MDT agreement and TDP.	.70	490.00
Grim, E.	7/07/21	Revise plan.	.60	420.00
Grim, E.	7/07/21	Review materials relevant to confirmation briefing.	1.80	1,260.00
Rubinstein, J.	7/07/21	Analysis re confirmation brief strategy (1.3); provide edits to next step strategy analysis (0.5); review correspondence from Debtors' counsel re supplemental insurance policy production (0.3); review insurer first set of requests for production to plaintiffs (0.9).	3.00	2,400.00
Wolf, D.	7/07/21	Revise plan documents re Sacklers' proposed edits re insurance coverage matters.	1.00	700.00
Wolf, D.	7/07/21	Confer with D. Port and J. Dougherty re Sackler settlement agreement re insurance coverage matters.	.60	420.00
Wolf, D.	7/07/21	Confer with A. Kramer, D. Windscheffel, and J. Hudson re Sackler settlement agreement re insurance coverage matters.	.80	560.00
Ogrey, S.	7/07/21	Compare schedule of insurance policies against Mintz redline re shareholder insurance rights.	1.40	322.00
Winstead, H.	7/08/21	Revise declaration in support of bankruptcy fee structure.	.90	855.00



Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/08/21	Review attorney fee submissions for insurance considerations.	.30	217.50
Hudson, J.	7/08/21	Analyze potential approaches to so-called "neutrality" in plan documents.	.50	362.50
Hudson, J.	7/08/21	Revise insurance settlement strategy to reflect litigation and plan developments.	.90	652.50
Hudson, J.	7/08/21	Communicate with Debtors re confirmation findings related to insurance.	.10	72.50
Hudson, J.	7/08/21	Analyze outstanding issues for shareholder insurance assignment documentation.	.30	217.50
Hudson, J.	7/08/21	Revise supplemental order re expert retention.	.30	217.50
Grim, E.	7/08/21	Draft analysis of plan insurance issues.	1.80	1,260.00
Grim, E.	7/08/21	Revise declaration re plan attorneys' fee provisions.	.90	630.00
Grim, E.	7/08/21	Draft brief in support of insurance aspects of plan.	.80	560.00
Rubinstein, J.	7/08/21	Review materials for drafting insurance-related portions of brief in support of confirmation plan (2.6); review draft Weinberger declaration (0.3); review mediators report (0.5).	3.40	2,720.00
Ogrey, S.	7/08/21	Review confirmation briefs from other bankruptcies for certain language.	1.30	299.00
Sraders, S.	7/08/21	Review confirmation briefing in Babcock bankruptcy.	.60	345.00
Sraders, S.	7/08/21	Analyze insurance "neutrality" issues.	.90	517.50
Colcock, S.	7/08/21	Research Takata case for bankruptcy plan documents.	.50	165.00
Gilbert, S.	7/09/21	Confer with Davis Polk re co-defendants.	1.00	1,700.00
Quinn, K.	7/09/21	Confer with C. Litherland and E. Grim re revised MDT procedures language.	.70	770.00
Shore, R.	7/09/21	Confer with J. Rubinstein re strategy re confirmation brief findings.	.80	1,080.00
Litherland, C.	7/09/21	Confer with E. Grim and K. Quinn re back-up valuation mechanism.	.70	980.00
Litherland, C.	7/09/21	Communications with E. Grim and others re back-up valuation mechanism.	.40	560.00
Hudson, J.	7/09/21	Revise plan section re insurance injunction.	.60	435.00
Hudson, J.	7/09/21	Confer with Debtors re responses to insurer plan comments.	.10	72.50
Hudson, J.	7/09/21	Confer with Debtors and UCC re insurance-related findings to seek at confirmation.	.60	435.00
Grim, E.	7/09/21	Review plan payment provisions for purposes of revising MDT agreement.	1.70	1,190.00
Grim, E.	7/09/21	Revise MDT agreement.	.70	490.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Grim, E.	7/09/21	Analyze plan models for treatment of channeled claims (2.3); communicate with Debtors re same (0.9).	3.20	2,240.00
Grim, E.	7/09/21	Confer with C. Litherland and K. Quinn re mechanisms for direct actions against insurers.	.70	490.00
Grim, E.	7/09/21	Confer with Debtors' counsel (M. Tobak, others) re insurance-related confirmation findings.	.60	420.00
Rubinstein, J.	7/09/21	Confer with R. Shore re strategy re confirmation brief findings (0.8); analysis re drafting of same (0.5).	1.30	1,040.00
Litherland, C.	7/10/21	Communications with E. Grim and others re various creditor groups reliance on insurance recoveries and impact on back-up valuation.	.40	560.00
Grim, E.	7/10/21	Review plan provisions relevant to MDT insurance injunctions procedures (0.6); draft analysis re same (0.6).	1.20	840.00
Grim, E.	7/10/21	Draft MDT insurance injunctions procedures.	.50	350.00
Rubinstein, J.	7/10/21	Review materials relevant to insurance insert to plan confirmation brief (1.9); begin outlining same (0.4).	2.30	1,840.00
Quinn, K.	7/11/21	Review MDT procedures re insurance lift stay.	.40	440.00
Litherland, C.	7/11/21	Analysis of options for resolution of issues related to back-up valuation mechanism.	.60	840.00
Hudson, J.	7/11/21	Confer with Debtors re proposed revisions to plan documents relating to shareholder insurance rights.	.50	362.50
Hudson, J.	7/11/21	Revise plan section re insurance injunction.	.10	72.50
Grim, E.	7/11/21	Revise MDT insurance injunctions procedures based on feedback team.	1.50	1,050.00
Grim, E.	7/11/21	Review additional plan provisions relevant to MDT insurance injunctions procedures (0.8); continue drafting analysis re same (0.7).	1.50	1,050.00
Grim, E.	7/11/21	Review revisions to sixth amended plan.	.20	140.00
Grim, E.	7/11/21	Draft analysis of insurance "neutrality" issues.	.90	630.00
Grim, E.	7/11/21	Communicate with Debtors re revisions to MDT agreement.	.40	280.00
Rubinstein, J.	7/11/21	Continue reviewing materials relevant to insurance insert to plan confirmation brief (0.5); continue outlining same (1.4).	1.90	1,520.00
Wolf, D.	7/11/21	Revise plan documents re insurance coverage matters.	.70	490.00
Gilbert, S.	7/12/21	Confer with team re status of plan and next steps for insurance recovery.	.40	680.00
Gilbert, S.	7/12/21	Confer with co-counsel re Newco board.	1.00	1,700.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Gilbert, S.	7/12/21	Analyze insurance-related plan issues.	.50	850.00
Gilbert, S.	7/12/21	Confer with Davis Polk re Newco and Topco.	2.00	3,400.00
Gilbert, S.	7/12/21	Confer with Davis Polk re plan.	1.00	1,700.00
Quinn, K.	7/12/21	Confer with team re status and strategy.	.40	440.00
Shore, R.	7/12/21	Confer with J. Hudson re Chubb comments to plan.	.40	540.00
Shore, R.	7/12/21	Confer with potential board candidate for Newco.	1.00	1,350.00
Shore, R.	7/12/21	Confer with team re plan and insurance-recovery issues (0.4); analyze insurance recovery options in plan (0.9).	1.50	2,025.00
Hudson, J.	7/12/21	Confer with Kramer Levin (B. Kelly) and E. Grim re plan structure and impact on various aspects of insurance recovery.	.90	652.50
Hudson, J.	7/12/21	Analyze next steps for "neutrality".	.20	145.00
Hudson, J.	7/12/21	Review requested plan revisions for call with Chubb.	.10	72.50
Hudson, J.	7/12/21	Review draft sixth amended plan (0.3); draft supplement materials to address insurance implications (0.9).	1.20	870.00
Hudson, J.	7/12/21	Participate in call with Chubb re requested plan revisions.	.40	290.00
Hudson, J.	7/12/21	Confer with team re status of plan and next steps for insurance recovery.	.40	290.00
Grim, E.	7/12/21	Confer with B. Kelly (Brown Rudnick) and J. Hudson re MDT issues relating to insurance direct actions.	1.00	700.00
Grim, E.	7/12/21	Revise sixth amended plan and plan supplement.	2.30	1,610.00
Grim, E.	7/12/21	Communicate with Debtors' counsel (S. Massman, D. Kratzer) re plan and plan supplement edits.	.50	350.00
Grim, E.	7/12/21	Revise proposed insurer edits to plan.	1.60	1,120.00
Grim, E.	7/12/21	Confer with insurer counsel re proposed plan edits.	.40	280.00
Grim, E.	7/12/21	Research issues re insurer proposed plan edits.	1.70	1,190.00
Grim, E.	7/12/21	Confer with S. Gilbert, J. Hudson, and others re status of plan negotiations and adversary proceeding.	.40	280.00
Rubinstein, J.	7/12/21	Continue reviewing materials relevant to insurance insert to plan confirmation brief (1.6); continue drafting outline re same (2.8); confer with team re plan status and strategy (0.4).	4.80	3,840.00
Wolf, D.	7/12/21	Confer with D. Kratzer, D. McGehrin, A. Kramer, and D. Windscheffel re Chubb comments to plan documents.	.40	280.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Wolf, D.	7/12/21	Confer with S. Gilbert, K. Quinn, J. Rubinstein, J. Hudson, E. Grim, S. Sraders, A. Gaske, and E. Kaminsky re plan status and insurance recovery strategy.	.40	280.00
Wolf, D.	7/12/21	Revise plan documents re insurance coverage matters.	.80	560.00
Sanchez, J.	7/12/21	Review prior bankruptcy reorganization plans re insurance rights language.	6.00	2,250.00
Rush, M.	7/12/21	Confer with team re plan status and case strategy.	.40	270.00
Gaske, A.	7/12/21	Confer with team re case strategy and updates.	.40	230.00
Leveridge, R.	7/12/21	Confer with team re plan strategy and status.	.40	560.00
Sraders, S.	7/12/21	Confer with S. Gilbert, K. Quinn, J. Rubinstein, J. Hudson, E. Grim, D. Wolf, H. Frazier, A. Gaske, and E. Kaminsky re plan and strategy for next steps.	.40	230.00
Gilbert, S.	7/13/21	Confer with A. Troop re non-consenting state negotiations.	.50	850.00
Gilbert, S.	7/13/21	Confer with co-counsel (D. Molton, others) re Abbott claims.	1.00	1,700.00
Shore, R.	7/13/21	Confer with K. Eckstein re potential Newco board members.	.90	1,215.00
Hudson, J.	7/13/21	Revise MDT agreement section 3.01(e).	.20	145.00
Hudson, J.	7/13/21	Confer with IAC counsel (J. Dougherty) re finalizing shareholder insurance transfer.	.20	145.00
Hudson, J.	7/13/21	Revise insurers' proposed insurance "neutrality" language.	2.20	1,595.00
Hudson, J.	7/13/21	Analyze viability of potential approach to shareholder insurance transfer proposed by IACs.	.40	290.00
Hudson, J.	7/13/21	Telephone call with Debtors and UCC re MDT agreement section 3.01(e).	.40	290.00
Grim, E.	7/13/21	Research issues re plan insurance "neutrality" provision.	1.60	1,120.00
Grim, E.	7/13/21	Review and revise new version of sixth amended plan.	1.60	1,120.00
Grim, E.	7/13/21	Review proposed MDT procedures to prepare for call with Debtors and UCC.	.30	210.00
Grim, E.	7/13/21	Confer with Debtors (D. Kratzer) and UCC (A. Preis) re MDT insurer injunction procedures (0.4); communicate with A. Preis re follow-up issues on same (0.7).	1.10	770.00
Grim, E.	7/13/21	Confer with S. Sraders re research on plan "neutrality" provisions.	1.00	700.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Wolf, D.	7/13/21	Confer with A. Preis, B. Kelly, D. Kratzer, and E. Grim re plan documents re insurance coverage matters.	.40	280.00
Wolf, D.	7/13/21	Revise plan documents re insurance coverage matters.	.40	280.00
Sanchez, J.	7/13/21	Continue reviewing prior bankruptcy reorganization plans re insurance rights language.	2.30	862.50
Frazier, H.	7/13/21	Review and comment on insurer proposed language re insurance "neutrality" and revised plan language re same.	1.10	742.50
Ogrey, S.	7/13/21	Review insurance "neutrality" in previously confirmed plans.	.50	115.00
Sraders, S.	7/13/21	Analyze arguments re insurance "neutrality" (1.4); confer with E. Grim same (1.0).	2.40	1,380.00
Gilbert, S.	7/14/21	Confer with Davis Polk re plan.	1.00	1,700.00
Gilbert, S.	7/14/21	Confer with hospitals re plan.	.50	850.00
Gilbert, S.	7/14/21	Confer with co-counsel re confirmation briefing.	1.00	1,700.00
Quinn, K.	7/14/21	Confer with team re revised "neutrality" language.	.90	990.00
Quinn, K.	7/14/21	Correspond with team re draft language and provide edits to same.	.30	330.00
Quinn, K.	7/14/21	Draft argument insert for circulation to group.	.30	330.00
Quinn, K.	7/14/21	Communicate with team re MDT comments from Akin.	.20	220.00
Shore, R.	7/14/21	Confer with AHC re report on findings (0.5); confer with team re finding and "neutrality" plan language (0.9); communications with insurers re same and pursuit of findings (0.2); revise "neutrality" language (0.4).	2.00	2,700.00
Litherland, C.	7/14/21	Confer with J. Hudson, E. Grim, K. Quinn, and R. Shore re insurance "neutrality" and retained jurisdiction provisions.	.90	1,260.00
Litherland, C.	7/14/21	Communications with E. Grim, J. Hudson, and others re draft "neutrality" provision.	.40	560.00
Litherland, C.	7/14/21	Analysis of notes re confirmation brief insert.	.70	980.00
Litherland, C.	7/14/21	Communications with J. Rubinstein and others re status of confirmation findings discussions.	.10	140.00
Litherland, C.	7/14/21	Analysis of argument summary related to impact of bankruptcy on insurance issues.	.50	700.00
Winstead, H.	7/14/21	Review draft fee declaration and potential revisions proposed in conference call.	1.40	1,330.00
Hudson, J.	7/14/21	Analyze approaches to insurance-related findings of fact at confirmation.	.80	580.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/14/21	Revise "neutrality" wording in plan.	2.40	1,740.00
Hudson, J.	7/14/21	Confer with team re "neutrality" language in plan.	.90	652.50
Hudson, J.	7/14/21	Review insurance-related provisions of draft sixth amended plan.	.70	507.50
Hudson, J.	7/14/21	Confer with Debtors re "neutrality".	.40	290.00
Grim, E.	7/14/21	Communications with B. Kelly (Brown Rudnick) and R. Ringer (Kramer Levin) re revisions to MDT agreement.	1.20	840.00
Grim, E.	7/14/21	Revise MDT agreement.	1.10	770.00
Grim, E.	7/14/21	Research cases supporting proposed confirmation findings.	3.40	2,380.00
Grim, E.	7/14/21	Revise plan insurance "neutrality" language and related provisions.	1.20	840.00
Grim, E.	7/14/21	Communications with R. Shore, J. Hudson, and J. Rubinstein re brief in support of confirmation findings.	1.00	700.00
Grim, E.	7/14/21	Confer with R. Shore, J. Hudson, K. Quinn, and C. Litherland re approaches to plan insurance "neutrality" provisions.	.90	630.00
Rubinstein, J.	7/14/21	Analysis re confirmation brief strategy (0.8); review relevant materials (1.0); continue outlining argument (0.4).	2.20	1,760.00
Ogrey, S.	7/14/21	Review insurance "neutrality" provisions in prior bankruptcies for language in the confirmation orders detailing ruling on insurance provisions.	7.40	1,702.00
Sraders, S.	7/14/21	Confer with E. Kaminsky re insurance "neutrality".	.40	230.00
Kaminsky, E.	7/14/21	Confer with S. Sraders re insurance "neutrality" memorandum.	.40	200.00
Quinn, K.	7/15/21	Communicate with team re revised insurance language for plan.	.30	330.00
Quinn, K.	7/15/21	Review C. Litherland argument in favor of certain confirmation order findings.	.10	110.00
Litherland, C.	7/15/21	Communications with K. Quinn and others re arguments re insurer bankruptcy clauses.	.40	560.00
Litherland, C.	7/15/21	Communication with R. Jennings re insurance "neutrality" concepts.	.10	140.00
Winstead, H.	7/15/21	Confer with Brown Rudnick team re draft declaration.	.80	760.00
Winstead, H.	7/15/21	Research re unjust enrichment bankruptcy fee cases.	1.90	1,805.00
Hudson, J.	7/15/21	Confer with counsel for IACs (J. Dougherty) re shareholder assignment.	.50	362.50

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/15/21	Review discussions re MDT agreement section 3.01(e).	.20	145.00
Hudson, J.	7/15/21	Analyze approach to insurance-related findings of fact.	.40	290.00
Hudson, J.	7/15/21	Outline support for insurance-related findings of fact.	.50	362.50
Hudson, J.	7/15/21	Revise approach to insurance-related "neutrality" in plan.	.80	580.00
Grim, E.	7/15/21	Review outline and research re insurance-related confirmation issues.	.70	490.00
Grim, E.	7/15/21	Communicate with co-counsel (B. Kelly) and UCC counsel (A. Preis) re revisions to MDT agreement.	.80	560.00
Grim, E.	7/15/21	Review outline and research re insurance "neutrality" issues.	.80	560.00
Rubinstein, J.	7/15/21	Begin drafting insurance findings insert to confirmation brief (2.6); analysis re factual support for insurance findings (0.8).	3.40	2,720.00
Ogrey, S.	7/15/21	Continue to review other bankruptcy cases re insurance rights issues.	.70	161.00
Sraders, S.	7/15/21	Draft memorandum re insurance "neutrality".	.70	402.50
Kaminsky, E.	7/15/21	Research re insurance "neutrality" memorandum.	4.30	2,150.00
Gilbert, S.	7/16/21	Confer with J. Guard re revisions to declaration.	.50	850.00
Quinn, K.	7/16/21	Communicate with team re extension of time and proposed findings.	.40	440.00
Shore, R.	7/16/21	Confer with co-counsel and team re insurance-related findings (0.5); comment on chart re factual support and witnesses for findings (1.2); communicate with M. Otterbourg re findings (0.3).	2.00	2,700.00
Hudson, J.	7/16/21	Confer with AHC co-counsel (M. Cyganowski and J. Feeney) re process for obtaining insurance-related findings at confirmation.	.50	362.50
Hudson, J.	7/16/21	Analyze next steps for obtaining insurance-related findings.	.60	435.00
Hudson, J.	7/16/21	Confer with Debtors re "neutrality" provisions of plan.	.10	72.50
Hudson, J.	7/16/21	Confer with counsel for IACs (J. Dougherty) re potential alternate approaches to shareholder insurance assignment.	.20	145.00
Grim, E.	7/16/21	Confer with co-counsel (M. Cyganowski) re insurance issues in confirmation briefing.	.50	350.00
Grim, E.	7/16/21	Revise insurance-related confirmation findings.	.40	280.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/16/21	Draft insurance findings portion of confirmation brief insert (2.6); confer with AHC counsel, R. Shore, E. Grim, and J. Hudson re insurance findings (0.5); analysis re insurance findings (0.8).	3.90	3,120.00
Frazier, H.	7/16/21	Analyze case law re insurance "neutrality" issues.	.30	202.50
Ogrey, S.	7/16/21	Review specific "neutrality" language in prior plan / confirmation orders.	4.30	989.00
Kaminsky, E.	7/16/21	Continue researching insurance "neutrality" issue.	2.10	1,050.00
Gilbert, S.	7/18/21	Review and revise pleadings re mediation.	.50	850.00
Gilbert, S.	7/18/21	Confer with A. Preis re plan.	.50	850.00
Gilbert, S.	7/18/21	Confer with K. Eckstein re negotiations with non-consenting states (0.6); confer with A. Troop re related plan issues (0.4).	1.00	1,700.00
Gilbert, S.	7/18/21	Confer with DOJ re plan.	.70	1,190.00
Hudson, J.	7/18/21	Analyze proposal by IAC re treatment of Purdue Canada claims under shareholder insurance assignment.	.30	217.50
Gilbert, S.	7/19/21	Confer with K. Eckstein re Newco.	.70	1,190.00
Gilbert, S.	7/19/21	Confer with co-counsel re plan issues.	1.00	1,700.00
Quinn, K.	7/19/21	Review case update re plan objection deadline and open issues.	.50	550.00
Quinn, K.	7/19/21	Confer with team re revisions to proposed confirmation findings.	.60	660.00
Quinn, K.	7/19/21	Review first insurer objection re "neutrality" issues.	.40	440.00
Hudson, J.	7/19/21	Confer with counsel for insurers (J. Davis) re seeking extension to object to plan.	.10	72.50
Hudson, J.	7/19/21	Revise findings of fact and associated checklist for confirmation order.	2.20	1,595.00
Hudson, J.	7/19/21	Revise initial draft of insurance section of confirmation brief.	.20	145.00
Hudson, J.	7/19/21	Review insurers' "neutrality" related arguments.	.10	72.50
Hudson, J.	7/19/21	Confer with team re confirmation pieces related to insurance.	.60	435.00
Hudson, J.	7/19/21	Review objection that may impact insurance-related arguments asserted by IACs.	.10	72.50
Grim, E.	7/19/21	Revise confirmation brief.	3.30	2,310.00
Grim, E.	7/19/21	Review insurer objection (0.5); draft outline re same (0.7).	1.20	840.00
Grim, E.	7/19/21	Confer with K. Quinn, J. Hudson, J. Rubinstein, and R. Leveridge re confirmation order findings.	.60	420.00
Rubinstein, J.	7/19/21	Revise proposed findings of fact and factual support re same (2.7); confer with team re same (0.6).	3.30	2,640.00



Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Wolf, D.	7/19/21	Review plan objections re insurance coverage matters.	.20	140.00
Leveridge, R.	7/19/21	Confer with team re proposed findings for confirmation.	.60	840.00
Ogrey, S.	7/19/21	Continue to review insurance neutral/non-neutral language in confirmed list of bankruptcies.	1.90	437.00
Ogrey, S.	7/19/21	Continue review of prior bankruptcy plans re "neutrality" language.	1.00	230.00
Kaminsky, E.	7/19/21	Research re insurance "neutrality" memorandum.	2.30	1,150.00
Gilbert, S.	7/20/21	Review pleadings re confirmation.	.50	850.00
Quinn, K.	7/20/21	Begin review of certain plan objections.	1.50	1,650.00
Winstead, H.	7/20/21	Review US Trustee objection re section 5.8 of plan.	.80	760.00
Hudson, J.	7/20/21	Analyze potential approaches to insurance sections of confirmation briefing.	.20	145.00
Hudson, J.	7/20/21	Provide feedback on Chubb comments to plan.	.50	362.50
Hudson, J.	7/20/21	Revise findings of fact for confirmation.	.30	217.50
Hudson, J.	7/20/21	Confer with Debtors' counsel (Davis Polk and Reed Smith) and AHC co-counsel (Kramer Levin) re preparing for confirmation.	.20	145.00
Grim, E.	7/20/21	Draft reply to insurer objections re "neutrality".	3.20	2,240.00
Rubinstein, J.	7/20/21	Analysis re proposed findings of fact (0.2); review insurer plan objections (1.5).	1.70	1,360.00
Rush, M.	7/20/21	Review insurers' objection to plan.	.40	270.00
Ogrey, S.	7/20/21	Complete review of historical bankruptcy plans to confirm the plan listed was the plan confirmed.	3.20	736.00
Sraders, S.	7/20/21	Analyze confirmed plans for insurance "neutrality" provisions.	3.10	1,782.50
Colcock, S.	7/20/21	Review communications from D. Kratzer re Chubb's objection deadline to plan.	.10	33.00
Gilbert, S.	7/21/21	Correspond with S. Birnbaum re plan.	.50	850.00
Gilbert, S.	7/21/21	Confer with Davis Polk re plan objections.	1.00	1,700.00
Quinn, K.	7/21/21	Confer with Debtors re preparation for confirmation issues [partial].	.90	990.00
Quinn, K.	7/21/21	Correspond with team re insurers' request for plan edits.	.40	440.00
Shore, R.	7/21/21	Confer with Debtors re findings and "neutrality" issues.	1.40	1,890.00
Winstead, H.	7/21/21	Confer with Kramer Levin team re US Trustee objection to section 5.8 of the plan.	.50	475.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/21/21	Confer with AHC co-counsel (Kramer Levin and Brown Rudnick) re evidence to present at confirmation.	.40	290.00
Hudson, J.	7/21/21	Analyze options for evidence to present at confirmation.	1.00	725.00
Hudson, J.	7/21/21	Provide feedback on Chubb's remaining requested edits to plan.	1.40	1,015.00
Hudson, J.	7/21/21	Outline process for briefing on insurance "neutrality" issue.	.20	145.00
Hudson, J.	7/21/21	Confer with IAC counsel (J. Dougherty) re insurance assignment.	.10	72.50
Hudson, J.	7/21/21	Confer with Debtors' counsel (Davis Polk, Reed Smith) and AHC co-counsel (Kramer Levin) re evidence to present at confirmation.	1.40	1,015.00
Grim, E.	7/21/21	Draft reply to "neutrality" objection.	4.30	3,010.00
Grim, E.	7/21/21	Confer with Debtors re confirmation briefing strategy for insurance issues.	1.40	980.00
Grim, E.	7/21/21	Confer with co-counsel (D. Blabey, others) re confirmation objections and briefing strategy.	.40	280.00
Grim, E.	7/21/21	Revise insurer proposed plan language.	.60	420.00
Rubinstein, J.	7/21/21	Revise memorandum of law in support of insurance-related findings (2.1); participate in call with Debtors' counsel re plan confirmation (1.4); participate in call with Kramer Levin re fee issues and confirmation briefing coordination (0.3); analyze confirmation strategy (1.0).	4.80	3,840.00
Leveridge, R.	7/21/21	Participate in call with Debtors' counsel re confirmation hearing and proposed findings.	1.40	1,960.00
Gilbert, S.	7/22/21	Confer with Davis Polk re co-defendants.	.60	1,020.00
Gilbert, S.	7/22/21	Confer with J. Cicala re co-defendants.	.40	680.00
Quinn, K.	7/22/21	Review insurance-related plan objections.	1.50	1,650.00
Hudson, J.	7/22/21	Outline process for presenting valuation expert testimony at confirmation.	.70	507.50
Hudson, J.	7/22/21	Outline options for resolving insurer objections.	.10	72.50
Hudson, J.	7/22/21	Confer with co-counsel for AHC (D. Blabey) re assignment of insurance rights in connection with confirmation briefing.	.50	362.50
Hudson, J.	7/22/21	Review insurer objections to plan.	.20	145.00
Grim, E.	7/22/21	Draft reply to insurer plan objections.	2.90	2,030.00
Grim, E.	7/22/21	Confer with J. Cicala, S. Gilbert and S. Sradars re co-defendant issues.	.50	350.00
Grim, E.	7/22/21	Research issues relating to insurer plan objections.	.60	420.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/22/21	Review and revise portions of draft confirmation brief and Gnarus declaration in support (5.1); review additional insurer objections to plan (0.5).	5.60	4,480.00
Sanchez, J.	7/22/21	Review pharmacy benefit manager contracts re insurance rights.	2.30	862.50
Johnson, K.	7/22/21	Review and organize co-defendant / PBM contracts.	.70	161.00
Gaske, A.	7/22/21	Review expert reports re case strategy.	.20	115.00
Leveridge, R.	7/22/21	Communicate with co-plaintiffs' counsel re insurer objections to plan.	.40	560.00
Sraders, S.	7/22/21	Analyze documents relevant to co-defendant issues.	3.40	1,955.00
Sraders, S.	7/22/21	Confer with J. Cicala, S. Gilbert, and E. Grim re co-defendant issues.	.40	230.00
Gilbert, S.	7/23/21	Confer with S. Birnbaum and Davis Polk re co-defendants.	1.00	1,700.00
Quinn, K.	7/23/21	Confer with team re plan for response to objections.	1.20	1,320.00
Quinn, K.	7/23/21	Communicate with team re insurance-related revisions to plan documents.	.20	220.00
Quinn, K.	7/23/21	Review revised plan provision re co-defendant claim subrogees.	.10	110.00
Shore, R.	7/23/21	Confer with team re insurer objections.	1.20	1,620.00
Hudson, J.	7/23/21	Confer with Debtors' counsel (Reed Smith) re response to insurers' insurance-related objections to plan.	1.00	725.00
Hudson, J.	7/23/21	Confer with team re responding to insurers' objections to plan.	1.20	870.00
Hudson, J.	7/23/21	Review outline of factual support for confirmation in connection with insurance.	.20	145.00
Hudson, J.	7/23/21	Outline response to insurers' insurance-related objections to plan.	2.10	1,522.50
Grim, E.	7/23/21	Draft outline of response to insurer plan objections.	3.20	2,240.00
Grim, E.	7/23/21	Confer with Reed Smith (A. Kramer, others) re response to insurer objections.	1.00	700.00
Grim, E.	7/23/21	Confer with R. Shore, K. Quinn, J. Hudson, and J. Rubinstein re response to insurer objections.	1.20	840.00
Rubinstein, J.	7/23/21	Prepare chart of exhibits and affiants related to plan confirmation findings of facts (2.1); confer with team re response to insurer objections (1.2); analysis re plan confirmation related briefing (0.5); confer with Debtors' counsel, J. Hudson, and E. Grim re plan confirmation briefing (1.0); review J. Horewitz declaration re confirmation (0.3).	5.10	4,080.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Wolf, D.	7/23/21	Review insurers' proposed revisions to plan documents re insurance coverage matters.	.20	140.00
Sanchez, J.	7/23/21	Review Certain Insurers limited objection to plan confirmation and reservation of rights and track arguments.	2.70	1,012.50
Johnson, K.	7/23/21	Review docket for insurer confirmation objections.	.20	46.00
Leveridge, R.	7/23/21	Review communications re proposed findings and insurer objections.	1.20	1,680.00
Sraders, S.	7/23/21	Analyze documents relevant to co-defendant negotiations.	.20	115.00
Sraders, S.	7/23/21	Review insurer objections to confirmation (0.5); prepare chart summarizing same (2.4).	2.90	1,667.50
Kaminsky, E.	7/23/21	Draft memorandum re response to plan objections.	3.50	1,750.00
Kaminsky, E.	7/23/21	Analyze "neutrality" research.	1.00	500.00
Sraders, S.	7/24/21	Draft memorandum analyzing co-defendant issues.	4.80	2,760.00
Hudson, J.	7/25/21	Outline response to insurers' insurance-related objections to plan.	.20	145.00
Rubinstein, J.	7/25/21	Analysis re J. Horewitz declaration in support of plan.	1.00	800.00
Sraders, S.	7/25/21	Research re insurer objections to confirmation.	.70	402.50
Kaminsky, E.	7/25/21	Draft memorandum re insurance "neutrality".	3.80	1,900.00
Gilbert, S.	7/26/21	Confer with team re confirmation of plan strategy.	.90	1,530.00
Quinn, K.	7/26/21	Confer with team re confirmation issues.	.90	990.00
Hudson, J.	7/26/21	Confer with team re potential responses to co-defendant arguments.	.90	652.50
Hudson, J.	7/26/21	Revise J. Horewitz affidavit for confirmation.	.40	290.00
Hudson, J.	7/26/21	Propose revisions to plan to resolve certain insurance-related objections.	2.20	1,595.00
Hudson, J.	7/26/21	Confer with Debtors' counsel (Davis Polk) re revisions to plan to resolve certain insurance-related objections.	.10	72.50
Hudson, J.	7/26/21	Revise exhibit list for confirmation.	.30	217.50
Hudson, J.	7/26/21	Analyze Debtors' draft response to "neutrality" related objections.	.20	145.00
Hudson, J.	7/26/21	Review insurance aspects of co-defendants' objections to plan to prepare responses.	.50	362.50
Hudson, J.	7/26/21	Revise outline of insurance-related objections for opposition draft.	.50	362.50
Grim, E.	7/26/21	Confer with team re plan confirmation strategy.	.90	630.00
Grim, E.	7/26/21	Review adversary proceedings transcript for purposes of responding to insurer objections.	.50	350.00

Invoice Number: 11324202  
September 9, 2021

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Grim, E.	7/26/21	Revise plan to address insurer objections.	.60	420.00
Grim, E.	7/26/21	Review exhibit and witness lists for insurance-related aspects of confirmation brief.	.80	560.00
Grim, E.	7/26/21	Draft reply to insurer objections.	1.40	980.00
Grim, E.	7/26/21	Revise memorandum re co-defendant issues.	.40	280.00
Rubinstein, J.	7/26/21	Revise proposed exhibit lists (3.0); analysis re co-defendant objection response (0.7); analysis re J. Horewitz declaration (0.5); analysis re plan confirmation brief (1.2)	5.40	4,320.00
Rubinstein, J.	7/26/21	Review potential responses to co-defendant arguments.	.80	640.00
Wolf, D.	7/26/21	Confer with S. Gilbert, R. Leveridge, K. Quinn, J. Rubinstein, J. Hudson, E. Grim, and S. Sraders re plan confirmation strategy.	.90	630.00
Sanchez, J.	7/26/21	Review Certain Insurers cases in support of preemption of insurance rights (3.1); analyze non-assignment of rights statute under section 365 (0.8).	3.90	1,462.50
Frazier, H.	7/26/21	Confer with team re strategic issues related to confirmation.	.90	607.50
Frazier, H.	7/26/21	Analyze co-defendant objection and related pleadings and plan documents.	2.10	1,417.50
Rush, M.	7/26/21	Analyze issues relevant to co-defendant negotiations.	1.10	742.50
Johnson, K.	7/26/21	Review and organize insurer confirmation objections.	.20	46.00
Johnson, K.	7/26/21	Review docket re AHC response to disclosure statement objections.	.20	46.00
Gaske, A.	7/26/21	Confer with team re plan confirmation strategy.	.90	517.50
Leveridge, R.	7/26/21	Communications with co-plaintiffs' counsel re confirmation and proposed findings.	1.40	1,960.00
Sraders, S.	7/26/21	Confer with team re preparation for plan confirmation.	.90	517.50
Sraders, S.	7/26/21	Confer with outside counsel, E. Grim, and M. Rush re issues relevant to co-defendant negotiations.	.70	402.50
Sraders, S.	7/26/21	Research in support of brief in opposition to insurer objections to confirmation.	3.60	2,070.00
Kaminsky, E.	7/26/21	Confer with team re confirmation strategy.	.90	450.00
Kaminsky, E.	7/26/21	Research re insurance "neutrality".	1.10	550.00
Gilbert, S.	7/27/21	Confer with S. Birnbaum re co-defendant negotiations (0.4); confer with Debtors' counsel (E. Vonnegut) re same (0.6).	1.00	1,700.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Winstead, H.	7/27/21	Review revisions to draft fee declaration and confirmation brief.	.90	855.00
Hudson, J.	7/27/21	Confer with AHC co-counsel (Kramer Levin) re responding to insurer objections.	.10	72.50
Hudson, J.	7/27/21	Review Debtors' draft confirmation order.	.10	72.50
Hudson, J.	7/27/21	Confer with valuation expert re updates to reflect increase in shareholder payment.	.10	72.50
Grim, E.	7/27/21	Review draft confirmation order.	.20	140.00
Grim, E.	7/27/21	Research cases for reply to insurer and co-defendant objections.	.90	630.00
Grim, E.	7/27/21	Draft reply to insurer and co-defendant objections.	5.60	3,920.00
Grim, E.	7/27/21	Analyze co-defendant treatment in plan.	.30	210.00
Rubinstein, J.	7/27/21	Review Debtors' initial exhibit list (0.4); analysis re J. Horewitz declaration (1.6); analysis re proposed order re plan (2.7).	4.70	3,760.00
Frazier, H.	7/27/21	Analyze key issues for response to co defendant objection re insurance issues.	1.70	1,147.50
Johnson, K.	7/27/21	Review expert report service information.	.40	92.00
Gaske, A.	7/27/21	Draft summary of research re priority of claims and insureds for opposition to manufacturers, distributors, and pharmacies' plan objection.	1.70	977.50
Gaske, A.	7/27/21	Review cases cited in manufacturers, distributors, and pharmacies plan objection (1.8); draft summary distinguishing cases (1.0).	2.80	1,610.00
Gaske, A.	7/27/21	Research priority of insureds to policy proceeds (3.2); research prior of claims to policy proceeds re opposition to manufacturers, distributors, and pharmacies' plan objection (2.2).	5.40	3,105.00
Ogrey, S.	7/27/21	Review confirmation orders and plans from other cases for treatment of insurance issues.	.70	161.00
Sraders, S.	7/27/21	Continue drafting analysis of co-defendant issues.	1.30	747.50
Gilbert, S.	7/28/21	Confer with third parties re releases.	1.00	1,700.00
Gilbert, S.	7/28/21	Confer with B. Kelly re foundation tax issues.	.50	850.00
Gilbert, S.	7/28/21	Confer with G. Uzzi re plan.	.30	510.00
Shore, R.	7/28/21	Analyze TDPs.	1.00	1,350.00
Hudson, J.	7/28/21	Confer with counsel to Chubb re revisions to plan to partially resolve objections.	.80	580.00
Hudson, J.	7/28/21	Confer with AHC co-counsel (Kramer Levin) re responding to insurer objections.	.30	217.50
Hudson, J.	7/28/21	Review proposed confirmation schedule.	.10	72.50
Hudson, J.	7/28/21	Confer with AHC co-counsel (Kramer Levin) re seventh amended plan draft.	.10	72.50

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/28/21	Confer with counsel for IACs (J. Dougherty) re insurance assignment.	.40	290.00
Grim, E.	7/28/21	Continue to draft reply to insurer and co-defendant objections.	4.90	3,430.00
Grim, E.	7/28/21	Confer with Chubb counsel re objection.	.80	560.00
Grim, E.	7/28/21	Confer with co-counsel (D. Blabey) re confirmation brief.	.30	210.00
Grim, E.	7/28/21	Revise declaration for J. Horewitz.	.10	70.00
Rubinstein, J.	7/28/21	Analysis re co-defendant objection issues and outline response to same (3.0); confer with AHC co-counsel re same (0.3); communications re J. Horewitz declaration (0.2).	3.50	2,800.00
Frazier, H.	7/28/21	Research Bankruptcy Code priority issues applicable to joint tortfeasor claims as additional insureds.	1.90	1,282.50
Frazier, H.	7/28/21	Draft outline and key concepts re response to co-defendant objection.	1.10	742.50
Frazier, H.	7/28/21	Confer with counsel team re co-defendant objection issues.	.30	202.50
Gaske, A.	7/28/21	Confer with Kramer Levin team and Gilbert team (E. Grim, H. Frazier, J. Hudson, and J. Rubinstein) re manufacturer, distributor, and pharmacies' plan objection.	.30	172.50
Sraders, S.	7/28/21	Research re New York law re transfer of insurance rights.	1.70	977.50
Sraders, S.	7/28/21	Review proposed motion and order re retention of Nathan Associates.	.70	402.50
Quinn, K.	7/29/21	Confer with H. Frazier and J. Rubinstein re co-defendant insurance argument.	.40	440.00
Hudson, J.	7/29/21	Confer with expert (J. Horewitz, D. Maloney) re expert declaration.	.40	290.00
Hudson, J.	7/29/21	Review draft confirmation order.	.90	652.50
Hudson, J.	7/29/21	Confer with Debtors (D. Kratzer) re transfer of MDT insurance collateral and finalizing confirmation order.	.20	145.00
Hudson, J.	7/29/21	Confer with Debtors (Reed Smith) re co-defendant objection.	.10	72.50
Grim, E.	7/29/21	Continue to draft reply to insurer and co-defendant objections.	9.80	6,860.00
Grim, E.	7/29/21	Confer with H. Frazier re reply to co-defendant objections.	.60	420.00
Grim, E.	7/29/21	Confer with H. Frazier and J. Rubinstein re confirmation brief and findings.	.30	210.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/29/21	Review July 27 mediator report (0.2); analysis re J. Horewitz declaration (0.9); provide comments on response outline to co-defendant objections (0.3); communications with Debtors' counsel and AHC counsel re same (2.2); confer with K. Quinn and H. Frazier re co-defendant argument (0.4); confer with E. Grim and H. Frazier re confirmation findings (0.3).	4.30	3,440.00
Frazier, H.	7/29/21	Research re loss and priority in insurance proceeds ins support of opposition to co defendant objection.	1.70	1,147.50
Frazier, H.	7/29/21	Confer with E. Grim re co-defendant objection issues.	.60	405.00
Frazier, H.	7/29/21	Begin drafting response to co-defendant objection.	3.30	2,227.50
Frazier, H.	7/29/21	Revise outline re co-defendant objection response.	.30	202.50
Frazier, H.	7/29/21	Confer with J. Rubinstein and K. Quinn re response to co defendant objections.	.40	270.00
Frazier, H.	7/29/21	Confer with J. Rubinstein and E. Grim re confirmation briefing issues.	.30	202.50
Ogrey, S.	7/29/21	Continue to review non-profit plans/confirmation orders re property/insurance language re anti-assignment.	3.80	874.00
Sraders, S.	7/29/21	Review Debtors' agreements with pharmacies.	.30	172.50
Gilbert, S.	7/30/21	Confer with S. Burian re Newco.	.50	850.00
Quinn, K.	7/30/21	Review and comment on co-defendant response outline.	1.80	1,980.00
Winstead, H.	7/30/21	Review revisions to declarations and briefing re section 5.8 of plan.	2.10	1,995.00
Hudson, J.	7/30/21	Confirm extension of confirmation briefing schedule.	.10	72.50
Hudson, J.	7/30/21	Review draft confirmation order for insurance implications.	.20	145.00
Hudson, J.	7/30/21	Review expert revised declaration.	.10	72.50
Hudson, J.	7/30/21	Confer with Debtors' counsel (Davis Polk) re insurer objections and confirmation.	.30	217.50
Hudson, J.	7/30/21	Analyze potential approaches to MDT insurance collateral.	.50	362.50
Hudson, J.	7/30/21	Confer with Debtors' counsel (Davis Polk and Reed Smith) re insurers' "neutrality" arguments.	.70	507.50
Grim, E.	7/30/21	Continue to draft reply to insurer and co-defendant objections.	7.20	5,040.00



Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/30/21	Analysis re proposed confirmation order (0.6); correspond with Debtors' counsel and AHC counsel re same (0.2); analysis re J. Horewitz declaration (1.0); analysis re confirmation briefing (1.0); participate in AHC strategy call (0.4).	3.20	2,560.00
Frazier, H.	7/30/21	Continue drafting response to co-defendant arguments re insurer injunction and additional insured rights.	4.90	3,307.50
Frazier, H.	7/30/21	Review insurance facts related to co-defendant objections.	.20	135.00
Frazier, H.	7/30/21	Analyze confirmation issues and strategy.	.40	270.00
Frazier, H.	7/30/21	Review Gulf and St. Paul brief re relationship to co-defendant issues and additional insurance-related arguments.	.50	337.50
Frazier, H.	7/30/21	Research re jurisdictional issues related to co-defendant objection.	.80	540.00
Rush, M.	7/30/21	Communicate with S. Sraders re Debtors' claims against pharmacies.	.20	135.00
Johnson, K.	7/30/21	Cite check omnibus reply to objections and brief in support of confirmation.	2.60	598.00
Gaske, A.	7/30/21	Review memorandum re consent-to-settlement provisions.	.30	172.50
Ogrey, S.	7/30/21	Research issues relevant to insurance "neutrality" brief.	1.10	253.00
Sraders, S.	7/30/21	Correspond with J. Conroy and M. Rush re analysis of co-defendant issues.	.20	115.00
Sraders, S.	7/30/21	Research in support of response to insurer objections.	.20	115.00
Kaminsky, E.	7/30/21	Research re insurance "neutrality".	1.90	950.00
Grim, E.	7/31/21	Continue to draft reply to insurer and co-defendant objections.	2.30	1,610.00
Rubinstein, J.	7/31/21	Revise sections of confirmation brief.	2.00	1,600.00
<b>Project Total:</b>			<b>507.00</b>	<b>\$ 392,554.00</b>

**A020: Insurance Adversary Proceeding**

Name	Date	Services	Hours	Amount
Quinn, K.	7/01/21	Review transcript of hearing to inform strategy.	.70	770.00
Shore, R.	7/01/21	Analyze insurance litigation issues (1.7); confer with team re adversary proceeding strategy (0.5); review excluded policy list and comment on same (0.8).	3.00	4,050.00
Hudson, J.	7/01/21	Confer with team re litigation strategy.	.50	362.50

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Rubinstein, J.	7/01/21	Draft correspondence to District Court re motion to withdraw reference and review transcripts relevant to same (2.2); analysis re proposed TIG stay order and review of correspondence re same, including TIG letter to court (0.6); confer with team re litigation strategy (0.5); analysis re confirmation issues (1.7).	5.00	4,000.00
Rush, M.	7/01/21	Analyze insurance litigation strategy.	.60	405.00
Rush, M.	7/01/21	Communicate with team re TIG order and letter to Court.	.80	540.00
Rush, M.	7/01/21	Confer with team re adversary proceeding status and strategy.	.50	337.50
Leveridge, R.	7/01/21	Revise and finalize response to TIG's proposed order re stay.	3.40	4,760.00
Leveridge, R.	7/01/21	Confer with team re insurance litigation strategy.	.50	700.00
Leveridge, R.	7/01/21	Revise letter to District Court re motion to withdraw the reference and impact of June 21 rulings (1.3); communications with co-counsel re edits to same (0.6).	1.90	2,660.00
Sraders, S.	7/01/21	Confer with team re adversary proceeding strategy and next steps.	.50	287.50
Colcock, S.	7/01/21	Communicate with team re letter to Judge Drain and proposed order.	.70	231.00
Colcock, S.	7/01/21	Revise citations in letter to Judge Drain.	.60	198.00
Colcock, S.	7/01/21	Revise exhibits to letter to Judge Drain.	2.40	792.00
Colcock, S.	7/01/21	Confer with team re insurance adversary proceeding strategy.	.50	165.00
Hudson, J.	7/02/21	Analyze next steps for insurance litigation.	.20	145.00
Rubinstein, J.	7/02/21	Review entered TIG stay order and communications re same (0.4); review letter from District Court re Liberty motion to withdraw reference (0.4); confer with Debtors' counsel re strategy (0.6); confer with team re strategy (0.8); analysis re response to arbitration insurers re next steps conference (0.2); revise correspondence to non-arbitration-asserting insurers re discovery production date (0.3); analyze response to insurers re protective order provisions (0.3).	3.00	2,400.00
Rush, M.	7/02/21	Confer with plaintiffs' counsel re motion to withdraw the reference.	.50	337.50
Leveridge, R.	7/02/21	Review Judge Briccetti order re parties' positions in light of Judge Drain June 21 ruling re arbitrations (0.8); communicate with co-counsel and opposing counsel re same (2.1).	2.90	4,060.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Leveridge, R.	7/02/21	Communications with co-counsel and opposing counsel re discovery in adversary proceeding.	1.40	1,960.00
Colcock, S.	7/02/21	Review order granting motion for relief from automatic stay and order re motion to withdraw the reference (0.7); revise pleading tracking spreadsheet (0.2)	.90	297.00
Colcock, S.	7/02/21	Revise materials for insurer letters.	.30	99.00
Quinn, K.	7/05/21	Review Limon case cited by Judge Drain.	.30	330.00
Hudson, J.	7/05/21	Revise presentation of options following June 21 hearing for client meeting.	1.20	870.00
Hudson, J.	7/06/21	Confer with PI representatives (S. Higgins and A. Andrews) re next steps following June 21 hearing.	.20	145.00
Hudson, J.	7/06/21	Revise presentation of options following June 21 hearing for client meeting.	1.30	942.50
Hudson, J.	7/06/21	Revise confidentiality agreement for discussions with insurers.	.10	72.50
Rubinstein, J.	7/06/21	Provide comments on client presentation (0.7); analyze confirmation brief (0.7); continue review of Debtors' deponent testimony potentially relevant to adversary proceeding (4.3)	5.70	4,560.00
Rush, M.	7/06/21	Review presentation for client re case status and strategy.	.40	270.00
Leveridge, R.	7/06/21	Review and propose edits to strategy slides for client presentation (0.8); review comments from team re same (0.4).	1.20	1,680.00
Leveridge, R.	7/06/21	Review communication from opposing counsel re letter to court and discovery	.60	840.00
Colcock, S.	7/06/21	Review Debtors' letter to Judge McMahon (0.4); revise pleading tracking spreadsheet (0.1)	.50	165.00
Kaminsky, E.	7/06/21	Review motion for more definite statement.	1.80	900.00
Hudson, J.	7/07/21	Review present recommendations to client re next steps following June 21 ruling.	.90	652.50
Hudson, J.	7/07/21	Analyze policy evidence to resolve National Union motion for more definite statement.	.20	145.00
Bonesteel, A.	7/07/21	Review Debtors' policies and compare to KCIC version.	1.00	315.00
Leveridge, R.	7/07/21	Communications with Debtors' counsel re litigation matters.	.40	560.00
Leveridge, R.	7/07/21	Communicate with Debtors' counsel re motion to withdraw.	.60	840.00
Leveridge, R.	7/07/21	Review discovery requests from insurers.	.80	1,120.00
Shore, R.	7/08/21	Confer with team re litigation insurance strategy (0.6); review correspondence re discovery (0.9).	1.50	2,025.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/08/21	Confer with team re litigation status and strategy.	.60	435.00
Hudson, J.	7/08/21	Review first set of discovery requests from insurers.	.10	72.50
Hudson, J.	7/08/21	Revise draft confidentiality agreement for insurance settlement discussions.	.10	72.50
Grim, E.	7/08/21	Confer with team re insurance strategy.	.60	420.00
Rubinstein, J.	7/08/21	Review Gulf answer to complaint (0.4); confer with litigation team re strategy (0.6); analysis re offensive discovery and begin drafting offensive interrogatories (1.1); review revised letter to Judge Briccetti (0.3).	2.40	1,920.00
Rush, M.	7/08/21	Review insurers' requests for production.	1.20	810.00
Rush, M.	7/08/21	Communicate with team re answers to complaint.	.20	135.00
Rush, M.	7/08/21	Confer with team re case status and strategy.	.60	405.00
Bonesteel, A.	7/08/21	Confer with team re status and strategy.	.60	189.00
Gaske, A.	7/08/21	Communicate with J. Hudson re preparation for responding to insurer letters.	.20	115.00
Gaske, A.	7/08/21	Confer with team re litigation status and next steps.	.60	345.00
Gaske, A.	7/08/21	Revise spreadsheet tracking defendants' answers.	2.30	1,322.50
Leveridge, R.	7/08/21	Communication with P. Breene re litigation strategy (0.9); communications with arbitration asserting insurers re meeting (0.3).	1.20	1,680.00
Leveridge, R.	7/08/21	Confer with team re litigation status and strategy.	.50	700.00
Leveridge, R.	7/08/21	Draft letter to Judge Briccetti re approach to motion to withdraw the reference (0.7); communicate with other plaintiffs' counsel re same (0.4).	1.10	1,540.00
Sraders, S.	7/08/21	Confer with R. Leveridge, R. Shore, J. Hudson, J. Rubinstein, M. Rush, A. Gaske, E. Kaminsky, and S. Colcock re strategy in insurance proceeding.	.60	345.00
Sraders, S.	7/08/21	Draft first set of interrogatories to defendants.	.40	230.00
Colcock, S.	7/08/21	Review insurers first set of requests for production to plaintiffs (0.2); revise discovery tracking spreadsheet (0.2).	.40	132.00
Colcock, S.	7/08/21	Confer with litigation team (R. Leveridge, M. Rush, J. Rubinstein, J. Hudson) and insurance team (R. Shore, A. Gaske, S. Sraders and E. Kaminsky) re status and strategy.	.60	198.00
Kaminsky, E.	7/08/21	Research re motion for more definite statement.	1.60	800.00
Kaminsky, E.	7/08/21	Revise Document O.	2.70	1,350.00
Kaminsky, E.	7/08/21	Confer with team re status update and strategy.	.60	300.00
Quinn, K.	7/09/21	Confer with team re insurance recovery strategy.	.30	330.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Shore, R.	7/09/21	Confer with D. Wolf, R. Leveridge, J. Rubinstein, J. Hudson, A. Gaske, and E. Kaminsky re insurance recovery strategy.	.30	405.00
Shore, R.	7/09/21	Review and revise draft letter to Judge Briccetti.	.20	270.00
Hudson, J.	7/09/21	Provide comments on letter to District Court Judge Briccetti.	.10	72.50
Hudson, J.	7/09/21	Confer with insurance and litigation teams re status and strategy.	.30	217.50
Hudson, J.	7/09/21	Confer with co-plaintiffs' counsel re settlement outreach to insurers.	.40	290.00
Hudson, J.	7/09/21	Finalize outreach to insurers re potential for settlement prior to confirmation.	.30	217.50
Rubinstein, J.	7/09/21	Revise letter to Judge Briccetti (1.3); correspond with Debtors' counsel re same (0.2); confer with M. Rush and A. Bonesteel re creation of document production index and analysis re same (0.7); review correspondence from TIG counsel re resumption of arbitration and draft response (1.4); confer with team re strategy (0.3).	3.90	3,120.00
Wolf, D.	7/09/21	Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, A. Gaske, and E. Kaminsky re insurance recovery strategy.	.30	210.00
Rush, M.	7/09/21	Confer with J. Rubinstein and A. Bonesteel re document productions.	.70	472.50
Rush, M.	7/09/21	Confer with team re case status and next steps.	.30	202.50
Bonesteel, A.	7/09/21	Confer with J. Rubinstein and M. Rush re document production issues.	.70	220.50
Gaske, A.	7/09/21	Confer with team re case strategy and next steps.	.30	172.50
Leveridge, R.	7/09/21	Review letter from TIG counsel re arbitration (0.4); communicate with co-counsel re same (0.6); review response to TIG (0.3).	1.30	1,820.00
Leveridge, R.	7/09/21	Communications with UCC counsel re letters to TIG and letter to Judge Briccetti.	.30	420.00
Sraders, S.	7/09/21	Confer with team re strategies for insurance recovery.	.30	172.50
Sraders, S.	7/09/21	Draft first set of interrogatories for insurers.	.80	460.00
Colcock, S.	7/09/21	Research spreadsheet "insurer named in the policy vs. the insurer named in the complaint".	.20	66.00
Colcock, S.	7/09/21	Confer with litigation team (M. Rush, J. Rubinstein, J. Hudson) and insurance team (R. Shore) re status and strategy.	.30	99.00
Colcock, S.	7/09/21	Review Debtors' first document production for insurance-related materials.	2.80	924.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Kaminsky, E.	7/09/21	Continue drafting Document O.	4.10	2,050.00
Hudson, J.	7/12/21	Analyze options for staying adversary proceeding and arbitrations following Judge Drain's June 21 ruling.	.70	507.50
Hudson, J.	7/12/21	Confer with National Union re resolving motion for more definite statement.	.10	72.50
Hudson, J.	7/12/21	Outline options for tracking insurance-related production for ease of reference in connection with recovery efforts.	.10	72.50
Rubinstein, J.	7/12/21	Analysis re staging of arbitrations relative to adversary proceeding (0.5); communications with insurer counsel and Debtors' counsel re protective order (0.2); communicate with Debtors' counsel re policy production (0.2); review document storage issues (0.3).	1.20	960.00
Rush, M.	7/12/21	Communicate with team re document productions.	.20	135.00
Bonesteel, A.	7/12/21	Begin analysis of Debtors' production volume 1.	1.00	315.00
Leveridge, R.	7/12/21	Communications with arbitration asserting insurer counsel re phasing abitrations (0.2); communications with Debtors' counsel re strategy (1.0).	1.20	1,680.00
Leveridge, R.	7/12/21	Communications with Debtors' counsel and insurer counsel re scheduling a call re protective order.	.30	420.00
Colcock, S.	7/12/21	Revise insurer contact list re letters to insurers.	.20	66.00
Kaminsky, E.	7/12/21	Continue drafting Document O.	3.40	1,700.00
Shore, R.	7/13/21	Confer with co-counsel re timing litigation/arbitration proceedings (0.3); review strategy re same (0.7).	1.00	1,350.00
Hudson, J.	7/13/21	Confer with co-plaintiffs' counsel (Debtors, UCC, AHC) re strategy as to adversary proceeding and arbitrations.	.30	217.50
Rubinstein, J.	7/13/21	Communicate with insurer counsel re scheduling meet-and-confer calls (0.2); analysis re document production tracking system (0.5); confer with co-plaintiffs and insurer counsel re protective order (0.3); confer with co-plaintiff counsel re strategy (0.3); revise first set of interrogatories to insurers in adversary proceeding (0.8).	2.10	1,680.00
Rush, M.	7/13/21	Communications with team re document productions	.80	540.00
Bonesteel, A.	7/13/21	Continue analysis of Debtors' production volume 1.	4.50	1,417.50
Gaske, A.	7/13/21	Revise tracking spreadsheet to reflect other tracking documents.	.80	460.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Leveridge, R.	7/13/21	Confer with plaintiffs' counsel re timing of adversary proceedings and arbitrations (0.3); analyze issues re same (1.0); prepare for call with arbitration asserting insurers (0.6),	1.90	2,660.00
Leveridge, R.	7/13/21	Confer with opposing counsel and other plaintiffs' counsel re protective order issues.	.70	980.00
Sraders, S.	7/13/21	Draft first set of interrogatories.	.60	345.00
Leveridge, R.	7/14/21	Communicate with co-plaintiffs' counsel and opposing counsel re meeting to discuss arbitration staging.	.40	560.00
Kaminsky, E.	7/14/21	Continue drafting Document O.	2.40	1,200.00
Shore, R.	7/15/21	Confer with team re insurance litigation.	.30	405.00
Hudson, J.	7/15/21	Confer with team re adversary proceeding.	.30	217.50
Rush, M.	7/15/21	Review transcript from motion dismiss hearing (0.1); draft communication to Court re unsealing records (0.3).	.40	270.00
Rush, M.	7/15/21	Confer with team re case status and strategy.	.30	202.50
Rush, M.	7/15/21	Communicate with team re document production issues.	.30	202.50
Johnson, K.	7/15/21	Confer with R. Shore, J. Hudson, M. Rush, R. Leveridge, A. Gaske, S. Colcock and A. Bonesteel re status and strategy.	.30	69.00
Bonesteel, A.	7/15/21	Draft first production document index.	5.00	1,575.00
Bonesteel, A.	7/15/21	Confer with R. Shore, J. Hudson, R. Leveridge, M. Rush, A. Gaske, S. Colcock and K. Johnson re status and strategy.	.30	94.50
Gaske, A.	7/15/21	Confer with litigation team re status and next steps.	.30	172.50
Leveridge, R.	7/15/21	Confer with team re litigation status (0.3); review draft interrogatories (1.3).	1.60	2,240.00
Leveridge, R.	7/15/21	Communicate with Debtors' counsel and UCC counsel re overture from arbitration insurers re call (0.4); communications with R. Shore re same (0.3); communications with P. Breene re letter to Briccetti and timetable for insurer insert (0.2).	.90	1,260.00
Sraders, S.	7/15/21	Revise draft interrogatories.	.10	57.50
Sraders, S.	7/15/21	Confer with team re strategy and next steps.	.30	172.50
Colcock, S.	7/15/21	Confer with litigation team (R. Leveridge, M. Rush, A. Bonesteel, K. Johnson) and insurance team (R. Shore, J. Hudson, A. Gaske, S. Sraders) re status and strategy.	.30	99.00
Hudson, J.	7/16/21	Analyze potential approaches to tracking productions for trial preparations.	.50	362.50

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Hudson, J.	7/16/21	Review documentation produced that addresses questions raised by National Union in motion for more definite statement.	.70	507.50
Rubinstein, J.	7/16/21	Communications with co-plaintiffs and opposing counsel re protective order, letter to District Court, and data storage issues (1.4); revise draft interrogatories to insurers (0.2); correspond with co-plaintiff counsel re same (0.1).	1.70	1,360.00
Rush, M.	7/16/21	Communicate with team re document collection issues.	.50	337.50
Rush, M.	7/16/21	Review analysis of insurers' answers.	.60	405.00
Bonesteel, A.	7/16/21	Draft first production document index.	6.00	1,890.00
Leveridge, R.	7/16/21	Communications with Debtors' and UCC counsel re call with arbitration insurers (0.4); communication with arbitration insurers' counsel re call re staging (0.5).	.90	1,260.00
Ogrey, S.	7/16/21	Review insurer correspondence from AIG and Federal re confidentiality agreement.	.40	92.00
Kaminsky, E.	7/16/21	Communicate with J. Hudson re motion for more definite statement.	.50	250.00
Shore, R.	7/19/21	Review interrogatories and provide comments to same (0.7); review insurer objections (0.3).	1.00	1,350.00
Hudson, J.	7/19/21	Draft coverage chart to aid in resolution of motion for more definite statement filed by National Union.	.20	145.00
Rubinstein, J.	7/19/21	Review filing notices (0.4); revise draft interrogatories to insurers and analysis re service (1.6); confer with litigation team re strategy (0.2); confer with Debtors' counsel re document production related issues (0.9).	3.10	2,480.00
Rush, M.	7/19/21	Confer with co-counsel re document production issues.	.90	607.50
Johnson, K.	7/19/21	Revise point of contact list for all non-arbitration insurers in support of serving discovery requests (1.7); communicate with team re relevant production documents (0.3).	2.00	460.00
Gaske, A.	7/19/21	Confer with team re litigation status.	.20	115.00
Leveridge, R.	7/19/21	Review communication from insurers re edits to Briccetti letter (0.3); communications with co-counsel re same (0.5).	.80	1,120.00
Leveridge, R.	7/19/21	Confer with team re litigation status and strategy.	.20	280.00
Leveridge, R.	7/19/21	Telephone call with co-counsel re document production by Debtors in adversary proceeding.	.90	1,260.00
Leveridge, R.	7/19/21	Communications with co-counsel re draft interrogatories to insurers.	.80	1,120.00



Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Sraders, S.	7/19/21	Revise draft interrogatories to incorporate comments from co-counsel.	1.10	632.50
Sraders, S.	7/19/21	Confer with team re litigation strategy and next steps.	.20	115.00
Colcock, S.	7/19/21	Review emails re Marsh production (0.3); review correspondence re discovery to be served on non-arbitration insurers (0.3).	.60	198.00
Kaminsky, E.	7/19/21	Confer with team re litigation update.	.20	100.00
Shore, R.	7/20/21	Review and revise joint letter to Judge Briccetti (0.2); review table re support for findings (0.1); confer with R. Leveridge on structure of coverage pursuit in advance of call with insurers (0.2).	.50	675.00
Hudson, J.	7/20/21	Confer with litigation team re insurance recovery strategy.	.40	290.00
Hudson, J.	7/20/21	Confer with arbitration-asserting insurers re potential staging.	.30	217.50
Hudson, J.	7/20/21	Analyze potential arguments from insurers in settlement context.	2.50	1,812.50
Hudson, J.	7/20/21	Review interaction of policy impact potentially impacting resolution of National Union's motion for more definite statement.	1.00	725.00
Rubinstein, J.	7/20/21	Review insurer edits to letter to Judge Briccetti and revise plaintiffs' section in same (0.8); communicate with team re service of interrogatories to insurers in adversary proceeding (0.4); review second production transmittal letter (0.1); revise draft letter to Judge Drain re protective order issue and review correspondence from insurers re same (0.8); review requests for production and interrogatories served by Navigators on plaintiffs (0.5); confer with arbitration insurers re process (0.4).	3.00	2,400.00
Rubinstein, J.	7/20/21	Confer with litigation team re insurance recovery strategy.	.40	320.00
Rush, M.	7/20/21	Confer with team re case status and strategy.	.40	270.00
Rush, M.	7/20/21	Draft correspondence to Court Clerk re sealed documents.	.60	405.00
Johnson, K.	7/20/21	Correspond with D. Li re unsealing previously sealed documents.	.50	115.00
Johnson, K.	7/20/21	Review and organize Debtors' production volume II.	.40	92.00
Johnson, K.	7/20/21	Draft certificate of service re first set of interrogatories.	.70	161.00
Johnson, K.	7/20/21	Confer with litigation team re insurance recovery strategy.	.40	92.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Gaske, A.	7/20/21	Confer with litigation team re insurance recovery strategy.	.40	230.00
Leveridge, R.	7/20/21	Revise letter to Judge Briccetti (0.6); review comments to same from others (0.1); review communications from co-counsel re same (0.1); review case authority re same (1.1).	1.90	2,660.00
Leveridge, R.	7/20/21	Prepare for and confer with arbitration asserting insurers re timing and staging of arbitrations.	1.70	2,380.00
Leveridge, R.	7/20/21	Confer with team re status of case-related projects.	.40	560.00
Sraders, S.	7/20/21	Confer with insurance team re strategy and next steps.	.40	230.00
Sraders, S.	7/20/21	Prepare interrogatories for service.	1.30	747.50
Colcock, S.	7/20/21	Review TCDI FTP site for new Debtors' productions (0.2); update production file with plaintiffs' second production (0.4),	.60	198.00
Colcock, S.	7/20/21	Confer with team re litigation status and strategy.	.40	132.00
Kaminsky, E.	7/20/21	Confer with litigation team re insurance recovery strategy.	.40	200.00
Hudson, J.	7/21/21	Confer with Debtors (Reed Smith) re potential resolution of motion for more definite statement.	.10	72.50
Hudson, J.	7/21/21	Review prior discussions with TIG re arbitration sequencing to follow up on meet-and-confer session.	.20	145.00
Hudson, J.	7/21/21	Confer with National Union (J. Davis) re next steps for resolving motion for more definite statement.	.10	72.50
Rubinstein, J.	7/21/21	Review correspondence re service of interrogatories on insurer defendants.	.20	160.00
Rush, M.	7/21/21	Review discovery requests served by insurers,	.70	472.50
Rush, M.	7/21/21	Revise notice of withdrawal (0.5); communications with co-counsel re same (0.3).	.80	540.00
Johnson, K.	7/21/21	File unredacted versions of consolidated opposition to defendants' motion to dismiss for lack of personal jurisdiction, Gaske declaration and related exhibits.	1.00	230.00
Johnson, K.	7/21/21	Revise certificate of service re first set of interrogatories.	.50	115.00
Johnson, K.	7/21/21	Review and organize insurer policy productions specific to Insurers #18, #19, #20 and #33.	.90	207.00
Johnson, K.	7/21/21	Draft notice of withdrawal re motion to seal.	.40	92.00
Leveridge, R.	7/21/21	Confer with Debtors' counsel re open issues in adversary proceeding.	.70	980.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Leveridge, R.	7/21/21	Review revised draft of letter to Judge Briccetti (0.6); communications with co-counsel re same (0.3); review communications with opposing counsel re same (0.4).	1.30	1,820.00
Sraders, S.	7/21/21	Serve interrogatories (0.7); revise certificate of service for same (0.6).	1.30	747.50
Colcock, S.	7/21/21	Confer with K. Johnson re unsealing personal jurisdiction documents.	.70	231.00
Colcock, S.	7/21/21	Review draft unsealing documents in preparation for filing with Court.	.20	66.00
Kaminsky, E.	7/21/21	Revise Document O.	2.90	1,450.00
Hudson, J.	7/22/21	Confer with team re litigation status and strategy.	.60	435.00
Rubinstein, J.	7/22/21	Revise agenda for team meeting (0.3); review communications re insurer responses and objections to first requests for production (0.6); coordinate filing of certificate of service re first set of interrogatories to insurers (0.2); review insurer edits to Briccetti letter (0.5); confer with litigation team re strategy (0.6).	2.20	1,760.00
Rush, M.	7/22/21	Confer with team re litigation status and strategy.	.60	405.00
Rush, M.	7/22/21	Communications with team re insurers' discovery responses and document productions.	.40	270.00
Johnson, K.	7/22/21	Finalize certificate of service re plaintiffs' first request for production and notice of withdrawal of motion for entry of an order to seal.	.50	115.00
Johnson, K.	7/22/21	Review and organize 7/21/2021 insurer productions and responses to plaintiffs' first request for production.	2.20	506.00
Gaske, A.	7/22/21	Confer with litigation team re case strategy and assignments.	.60	345.00
Gaske, A.	7/22/21	Analyze insurer responses and objections to first requests for production of documents (1.5); draft spreadsheet tracking insurer responses (1.4).	2.90	1,667.50
Gaske, A.	7/22/21	Research strength of Rule 408.	.80	460.00
Leveridge, R.	7/22/21	Review edits to letter to Judge Briccetti re status of adversary proceeding.	1.80	2,520.00
Leveridge, R.	7/22/21	Review status of pending projects (0.6); confer with team re same (0.6).	1.20	1,680.00
Leveridge, R.	7/22/21	Review insurer responses to discovery requests.	.70	980.00
Leveridge, R.	7/22/21	Communications with team re service of interrogatories to insurers.	.40	560.00
Sraders, S.	7/22/21	Review certificate of service for interrogatories.	.10	57.50

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Colcock, S.	7/22/21	Confer with R. Leveridge, M. Rush, J. Rubinstein, J. Hudson, A. Gaske, K. Johnson and E. Kaminsky re status and strategy.	.60	198.00
Hudson, J.	7/23/21	Review Navigators' subpoena to Marsh re insurance evidence.	.10	72.50
Rubinstein, J.	7/23/21	Communicate with Debtors' counsel re Navigator's subpoena directed to Marsh (0.4); review summary of insurer responses to first set of document requests (0.4).	.80	640.00
Gaske, A.	7/23/21	Review Navigators' document request to Marsh.	.30	172.50
Gaske, A.	7/23/21	Analyze additional insurer responses and objections to first request for production of documents (1.0); draft spreadsheet tracking additional responses (2.5); draft high-level summary of insurer responses (0.6).	4.10	2,357.50
Gaske, A.	7/23/21	Research strength of Rule 408 (2.7); draft summary of research (0.6).	3.30	1,897.50
Gaske, A.	7/23/21	Review document production from Insurer #33.	.30	172.50
Rubinstein, J.	7/26/21	Review interrogatories and requests for admission served by Steadfast.	.40	320.00
Rush, M.	7/26/21	Analyze insurers' discovery responses.	1.10	742.50
Johnson, K.	7/26/21	Revise summary of insurer responses spreadsheet.	3.80	874.00
Gaske, A.	7/26/21	Review small sample of documents produced by insurers.	1.10	632.50
Leveridge, R.	7/26/21	Review analysis by AG of discovery responses from insurers.	.60	840.00
Leveridge, R.	7/27/21	Review order from Judge Briccetti re arbitration insurers' motion to withdraw the reference.	.10	140.00
Kaminsky, E.	7/27/21	Revise Document O.	.80	400.00
Rubinstein, J.	7/28/21	Review TIG correspondence re resumption of arbitration (0.2); review letter submitted by insurers to Judge Drain re protective order (0.3).	.50	400.00
Leveridge, R.	7/28/21	Review communications from certain arbitration asserting insurers (0.4); communicate with co-counsel re same (0.5).	.90	1,260.00
Leveridge, R.	7/28/21	Review letter from insurers to Judge Drain re protective order issue.	.40	560.00
Kaminsky, E.	7/28/21	Revise Document O.	.50	250.00
Hudson, J.	7/29/21	Begin analysis of Insurance Issue #53.	.10	72.50
Rubinstein, J.	7/29/21	Review letter to Judge Drain re protective order (0.4); review and revise draft responses to American Guarantee and Steadfast first requests for production (2.0).	2.40	1,920.00

Invoice Number: 11324202  
September 9, 2021

Name	Date	Services	Hours	Amount
Leveridge, R.	7/29/21	Review draft response to insurers' letter on protective order issue (0.7); review communications from co-counsel re responses to insurers' discovery (0.2).	.90	1,260.00
Kaminsky, E.	7/29/21	Revise confidentiality agreements.	1.30	650.00
Kaminsky, E.	7/29/21	Revise Document O.	1.50	750.00
Shore, R.	7/30/21	Confer with team re insurance recovery strategy and next steps.	.40	540.00
Hudson, J.	7/30/21	Confer with team re insurance litigation status and strategy.	.40	290.00
Rubinstein, J.	7/30/21	Analysis re insurer discovery objections (0.4); revise draft responses to insurer requests for production (1.1); correspond with Debtors' counsel re responses to additional discovery requests from insurers (0.3).	1.80	1,440.00
Wolf, D.	7/30/21	Confer with R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders, and A. Gaske re insurance recovery matters.	.40	280.00
Rush, M.	7/30/21	Confer with team re litigation status.	.40	270.00
Rush, M.	7/30/21	Review draft responses to insurers' discovery requests.	1.50	1,012.50
Gaske, A.	7/30/21	Confer with insurance and litigation teams re insurance recovery strategy and next steps.	.40	230.00
Gaske, A.	7/30/21	Research local rules re meet-and-confer requirements prior to discovery motions.	.50	287.50
Leveridge, R.	7/30/21	Confer with team re litigation matters (0.4); review draft discovery responses (0.9); review correspondence re insurers' discovery responses (0.6).	1.90	2,660.00
Sraders, S.	7/30/21	Confer with insurance team re litigation status.	.40	230.00
Colcock, S.	7/30/21	Confer with team re litigation status and strategy.	.40	132.00
Kaminsky, E.	7/30/21	Confer with team re status and strategy.	.40	200.00
Kaminsky, E.	7/30/21	Revise confidentiality agreements.	1.50	750.00
Project Total:			227.40	\$ 171,520.00
<b>TOTAL CHARGEABLE HOURS</b>			<b>866.20</b>	
<b>TOTAL FEES</b>				<b>\$ 658,042.00</b>

Invoice Number: 11324202  
September 9, 2021

#### TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	41.50	1,700.00	70,550.00
Quinn, K.	25.00	1,100.00	27,500.00
Shore, R.	33.50	1,350.00	45,225.00
Litherland, C.	10.20	1,400.00	14,280.00
Holland, P.	5.40	290.00	1,566.00
Winstead, H.	11.20	950.00	10,640.00
Hudson, J.	97.90	725.00	70,977.50
Grim, E.	130.10	700.00	91,070.00
Rubinstein, J.	111.40	800.00	89,120.00
Wolf, D.	16.90	700.00	11,830.00
Sanchez, J.	17.20	375.00	6,450.00
Frazier, H.	22.80	675.00	15,390.00
Rush, M.	21.90	675.00	14,782.50
Johnson, K.	23.90	230.00	5,497.00
Bonesteel, A.	21.90	315.00	6,898.50
Gaske, A.	51.00	575.00	29,325.00
Leveridge, R.	51.90	1,400.00	72,660.00
Ogrey, S.	46.30	230.00	10,649.00
Sraders, S.	46.30	575.00	26,622.50
Colcock, S.	17.30	330.00	5,709.00
Kaminsky, E.	62.60	500.00	31,300.00
<b>TOTALS</b>	<b>866.20</b>		<b>\$ 658,042.00</b>

#### TASK SUMMARY

Task	Description	Hours	Amount
A001	Asset Analysis & Recovery	82.40	40,259.00
A004	Case Administration	1.60	408.00
A006	Employment / Fee Applications	8.50	3,476.00
A009	Meetings / Communications with AHC & Creditors	39.30	49,825.00
A019	Plan of Reorganization / Disclosure Statement	507.00	392,554.00
A020	Insurance Adversary Proceeding	227.40	171,520.00

Invoice Number: 11324202  
September 9, 2021

## EXPENSE DETAILS

### E106: Online Research

Date	Description	Task	Amount
7/26/21	Lexis	E106	136.00
7/28/21	Lexis	E106	433.49
7/30/21	Lexis	E106	865.96
7/31/21	Westlaw	E106	1,277.61
7/31/21	PACER	E106	94.40
<b>Sub-Total of Expenses:</b>			<b>\$ 2,807.46</b>

### E107: Delivery Services/Messenger

Date	Description	Task	Amount
6/12/21	Messenger & Delivery - United Parcel Service - US Bankruptcy Court - Southern District of New York - 06/12/2021	E107	63.87
6/12/21	Messenger & Delivery - United Parcel Service - US Bankruptcy Court - Southern District of New York - 06/12/2021	E107	40.24
<b>Sub-Total of Expenses:</b>			<b>\$ 104.11</b>

### E110: Out-of-Town Travel

Date	Description	Task	Amount
4/21/21	Travel - Airfare / Scott Gilbert / Travel from Washington DC to Miami FL / Coach Fare / Attend AHC Working Group Meeting / 4.21.21	E110	285.40
4/28/21	Travel - Airfare / Scott Gilbert / Travel from Miami FL to Washington DC / Coach Fare / Attend AHC Working Group Meeting / 4.28.21	E110	285.40
<b>Sub-Total of Expenses:</b>			<b>\$ 570.80</b>

**TOTAL EXPENSES** **\$ 3,482.37**

**TOTAL FEES AND EXPENSES** **\$ 661,524.37**